



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

1200 SIXTH AVENUE
SEATTLE, WA 98101

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #: Case number

TITLE: (b) (6), (b) (7)(C) ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable): Interviewee

PREPARED BY: (b) (6), (b) (7)(C)

**MEMORANDUM OF ACTIVITY
REPORT OF INVESTIGATION**

The status of this investigation is being changed to Closed Pending Suspension and Debarment Action. The investigation is pending a decision regarding Suspension and Debarment with Alturas Rancheria Tribe (Alturas), (b) (6), (b) (7)(C) Alturas, and (b) (6), (b) (7)(C) Alturas.

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
January 25, 2021

INTERVIEWEE (if applicable):
Interviewee

DRAFTED DATE:
January 25, 2021

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 1 of 1

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

Case Review Check List for I2M Investigations

Case Number:

Case Agent: (b) (6), (b) (7)(C)
Supervisor conducting the review: (b) (6), (b) (7)(C)

Date of Review: February 1, 2021

Case Initiation Tab

(b) (5)

Ensure the *Case Category* is accurate.

Ensure the *Case Title* is correct (see Procedure 206 for appropriate format to name investigations).

Example: If a subject is initially unknown but becomes known, ensure the title is changed. This also needs to be documented in an MOA.

Ensure the hotline number is listed if required.

Note: If the agent is missing the Hotline number, check with the agent to determine if the investigation required a Hotline number. If it does, ensure that the agent properly notifies the Hotline and adds the number.

Ensure *Budget Code* is correct. If case is superfund budget code, it needs to be an investigation that involves superfunds.

Investigative Plan Tab

(b) (5)

Ensure that at least three are listed in the *Inv Plan Tab* and/or *Leads Tab*.

Subsequent reviews add additional steps if necessary. Ensure all steps are completed or deleted if no longer required to complete.

Ensure all violations(s) are listed.

Ensure allegation(s) listed, and outcome noted if known. If there are subjects, each subject must have an allegation.

Indiv/Inst Tab

(b) (5)

Ensure subjects are identified on this tab with all identifying information completed.

If the subject is a government employee, subject grade noted in I2M. Ensure SES, political appointees, and other grades are noted.

If the subject is a non-government employee, unknown marked.

Referrals Tab

(b) (5)

Ensure an FBI letter or an administrative memo in the file. If there are multiple subjects, there must be an FBI letter for each one, unless they are all in one letter.

Report of Investigation Tab

Ensure a ROI signed is uploaded if one had been provided to the Agency. If one has been provided, ensure that a presentation for it is under the *Admin Tab*.

Criminal/Civil/Admin Tab

Ensure all data is filled out where applicable and in the correct location. If a presentation is made in any of these sections, ensure the outcome or declination has been properly included.

Joint Agency Tab

Ensure joint agencies are listed. If another agency is the lead, ensure this is identified.

Additional Information to Review

(b) (5)

Ensure that ASAC periodic case reviews have been conducted in the appropriate tab or are notated in the *Chron Log*.

Ensure agent notes have been uploaded.

Comments:

(b) (5)



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OFFICE OF INSPECTOR GENERAL

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Supervisor conducting the review: (b) (6), (b) (7)(C)

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(b) (5), (b) (7)(E)

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Criminal/Civil/Admin Tab

(b) (5), (b) (7)(E)

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Additional Information to Review

(b) (5), (b) (7)(E)

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Ensure agent notes have been uploaded.

Comments:

(b) (5), (b) (7)(E)



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OFFICE OF INSPECTOR GENERAL
1301 CONSTITUTION AVE, NW
WASHINGTON, DC 20004

Case Review Check List
OI-SA-2015-CFR-0104
Case Initiation Tab

08/03/2020

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Ensure allegation(s) listed, and outcome noted if known. If there are subjects, each subject must have an allegation.

Indiv/Inst Tab

Ensure subjects are identified on this tab with all identifying information completed.

(b) (5) Social Security Number

Date of Birth

Driver's License Number (in comment box)

Home Address

(b) (6), (b) (7)(C), (b) (5), (b) (7)(E)

If the subject is a government employee, subject grade noted in I2M. Ensure SES, political appointees, and other grades are noted.

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Ensure joint agencies are listed. If another agency is the lead, ensure this is identified.

Additional Information to review

(b) (5), (b) (7)(E)

[REDACTED]

[REDACTED]

[REDACTED]



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

75 HAWTHORNE ST IGI-1
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #:

TITLE: (b) (6), (b) (7)(C) ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable):

PREPARED BY: (b) (6), (b) (7)(C)

**MEMORANDUM OF ACTIVITY
OTHER**

NARRATIVE: On June 1, 2020, Special Agent (SA) (b) (6), (b) (7)(C), Office of Investigations, Office of Inspector General, U.S. Environmental Protection Agency, San Francisco, CA, received a copy of three Show Cause Notices (SCN) from (b) (6), (b) (7)(C), Attorney-Advisor, Suspension and Debarment Division (S/D), U.S. EPA (EPA), Washington, DC, (b) (6), (b) (7)(C) (Attachment 1-3). The SCN was from to (b) (6), (b) (7)(C), Suspension and Debarment Official, S/D, EPA, Washington, DC., to (b) (6), (b) (7)(C), Alturas Indian Rancheria, Alturas, CA (Alturas); (b) (6), (b) (7)(C), Alturas; and Alturas (Respondents). The SCN is based on information that between September 16, 2014, and October 16, 2014, (b) (6), (b) (7)(C) improperly drew down \$324,400 from a 2013–17 EPA Tribal General Assistance Program (GAP) Grant awarded to Alturas and then removed those funds from an Alturas bank account. On May 7, 2015, EPA informed (b) (6), (b) (7)(C) that the funds had been improperly drawn down and that the funds would need to be returned to EPA unless the they could provide adequate justification based on actual expenditures toward the purposes for which the Grant was awarded. The respondents have 30 days from the receipt of the SCN to respond to proposed debarment action.

Attachments:

1. SCN – Alturas, dated May 20, 2020



19-1052-00 SCN
Alturas Ind Rancheria

CASE: OI-SA-2015-CFR-0104

INTERVIEWEE (if applicable): N.A.

DATE OF ACTIVITY: 06/01/2020

DRAFTED DATE: 06/08/2020

AGENT(S):

(b) (6), (b) (7)(C)

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Page 1 of 2

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2. SCN - (b) (6), (b) (7)(C), dated May 20, 2020



19-1052-01 SCN
(b) (6), (b) (7)(C) 05282021

3. SCN - (b) (6), (b) (7)(C), dated May 20, 2020



SCN
(b) (6), (b) (7)(C) 052821

CASE: OI-SA-2015-CFR-0104

INTERVIEWEE (*if applicable*): N.A.

DATE OF ACTIVITY: 06/01/2020

DRAFTED DATE: 06/08/2020

AGENT(S):

(b) (6), (b) (7)(C)

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

75 HAWTHORNE ST IGI-1
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #:

TITLE: (b) (6), (b) (7)(C) ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable):

PREPARED BY: (b) (6), (b) (7)(C)

**MEMORANDUM OF ACTIVITY
OTHER**

NARRATIVE: On June 1, 2020, Special Agent (SA) (b) (6), (b) (7)(C), Office of Investigations, Office of Inspector General, U.S. Environmental Protection Agency, San Francisco, CA, received a copy of three Show Cause Notices (SCN) from (b) (6), (b) (7)(C), Attorney-Advisor, Suspension and Debarment Division (S/D), U.S. EPA (EPA), Washington, DC, (b) (6), (b) (7)(C) (Attachment 1-3). The SCN was from to (b) (6), (b) (7)(C), Suspension and Debarment Official, S/D, EPA, Washington, DC., to (b) (6), (b) (7)(C), Alturas Indian Rancheria, Alturas, CA (Alturas); (b) (6), (b) (7)(C), Alturas; and Alturas (Respondents). The SCN is based on information that between September 16, 2014, and October 16, 2014, (b) (6), (b) (7)(C) improperly drew down \$324,400 from a 2013–17 EPA Tribal General Assistance Program (GAP) Grant awarded to Alturas and then removed those funds from an Alturas bank account. On May 7, 2015, EPA informed (b) (6), (b) (7)(C) that the funds had been improperly drawn down and that the funds would need to be returned to EPA unless the they could provide adequate justification based on actual expenditures toward the purposes for which the Grant was awarded. The respondents have 30 days from the receipt of the SCN to respond to proposed debarment action.

Attachments:

1. SCN – Alturas, dated May 20, 2020



19-1052-00 SCN
Alturas Ind Rancheria

CASE: OI-SA-2015-CFR-0104

INTERVIEWEE (if applicable): N.A.

DATE OF ACTIVITY: 06/01/2020

DRAFTED DATE: 06/08/2020

AGENT(S):

(b) (6), (b) (7)(C)

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2. SCN - (b) (5), (b) (7)(C), dated May 20, 2020



19-1052-01 SCN
(b) (6), (b) (7)(C) 05282021

3. SCN - (b) (6), (b) (7)(C), dated May 20, 2020



SCN
(b) (6), (b) (7)(C) 052821

CASE: OI-SA-2015-CFR-0104

INTERVIEWEE (*if applicable*): N.A.

DATE OF ACTIVITY: 06/01/2020

DRAFTED DATE: 06/08/2020

AGENT(S):

(b) (6), (b) (7)(C)

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75 HAWTHORNE ST IGI-1
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #:

TITLE: (b) (6), (b) (7)(C) ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable):

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Attachments:

1. SCN – Alturas, dated May 20, 2020



19-1052-00 SCN
Alturas Ind Rancheria

CASE: OI-SA-2015-CFR-0104

INTERVIEWEE (if applicable): N.A.

DATE OF ACTIVITY: 06/01/2020

DRAFTED DATE: 06/08/2020

AGENT(S):

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2. SCN - (b) (6), (b) (7)(C), dated May 20, 2020



19-1052-01 SCN
(b) (6), (b) (7)(C) 05282021

3. SCN - (b) (6), (b) (7)(C), dated May 20, 2020



SCN
(b) (6), (b) (7)(C) 052821

CASE: OI-SA-2015-CFR-0104

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DATE OF ACTIVITY: 06/01/2020

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OFFICE OF INSPECTOR GENERAL

75 HAWTHORNE ST IGI-1
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #:

TITLE: (b) (6), (b) (7)(C) ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable):

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
OTHER

NARRATIVE: On May 19, 2020, Special Agent (SA) (b) (6), (b) (7)(C), Office of Investigations, Office of Inspector General, U.S. Environmental Protection Agency, San Francisco, CA, received a copy of an Action Referral Memorandum (ARM) from (b) (6), (b) (7)(C) Attorney-Advisor, Suspension and Debarment Division (S/D), U.S. EPA (EPA), Washington, DC, (b) (6), (b) (7)(C). The ARM was addressed to (b) (6), (b) (7)(C), Suspension and Debarment Official, S/D, EPA, Washington, DC. The ARM outlined a "Request for Proposed Debarment for the following: (b) (6), (b) (7)(C), (b) (5)

[REDACTED]

On May 7, 2015, EPA informed (b) (6), (b) (7)(C) that the funds had been improperly drawn down and that the funds would need to be returned to EPA unless the they could provide adequate justification based on actual expenditures toward the purposes for which the Grant was awarded. To date, at least \$160,964 of the withdrawn funds have not been justified and no funds have been returned to EPA.

Attachment:

1. ARM sent to (b) (6), (b) (7)(C), dated May 1, 2020



19-1052 Alturas et
al ARM.pdf

CASE: OI-SA-2015-CFR-0104

INTERVIEWEE (if applicable): N.A.

DATE OF ACTIVITY: 05/19/2020

DRAFTED DATE: 05/28/2020

AGENT(S):

(b) (6), (b) (7)(C)

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19-1052 Alturas et
al ARM.pdf

CASE: OI-SA-2015-CFR-0104

INTERVIEWEE (if applicable): N.A.

DATE OF ACTIVITY: 05/19/2020

DRAFTED DATE: 05/28/2020

AGENT(S):

(b) (6), (b) (7)(C)

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OFFICE OF INSPECTOR GENERAL

75 HAWTHORNE ST IGI-1
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #:

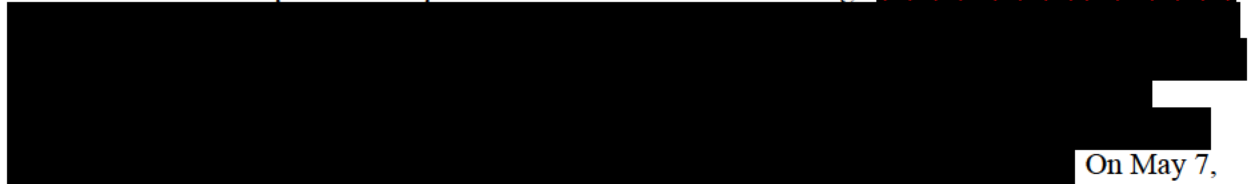
TITLE: (b) (6), (b) (7)(C) ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable):

PREPARED BY: (b) (6), (b) (7)(C)

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19-1052 Alturas et
al ARM.pdf

CASE: OI-SA-2015-CFR-0104

INTERVIEWEE (if applicable): N.A.

DATE OF ACTIVITY: 05/19/2020

DRAFTED DATE: 05/28/2020

AGENT(S):

(b) (6), (b) (7)(C)

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75 HAWTHORNE STREET
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #: Case number

TITLE: (b) (6), (b) (7)(C) ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable): Interviewee

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
RECORDS REVIEW

SUBJECT: Review of Plumas Bank Records for Alturas account # (b) (6), (b) (7)(C) and # (b) (6), (b) (7)(C)

On March 24, 2020, Special Agent (SA) (b) (6), (b) (7)(C) conducted a document review of Plumas Bank Records for Alturas Rancheria Tribe (Alturas). The records were provided by Plumas Bank as part of an EPA OIG Inspector General Subpoena response. The purpose of the review was (b) (6), (b) (7)(C), (b) (7)(E), (b) (5)

Alturas received approximately \$399,400 in EPA funding during the scope in question. The investigation confirmed (b) (6), (b) (7)(C), (b) (7)(E)

Background:

On (b) (6), (b) (7)(C) 2020, Agents interviewed (b) (6), (b) (7)(C) to gather information regarding potential embezzlement of Alturas funds to include EPA Grant funds, by (b) (6), (b) (7)(C) Alturas and (b) (6), (b) (7)(C) Alturas. During the interview, (b) (6), (b) (7)(C) said (b) (6), (b) (7)(C) but could not recall how much money (b) (6), (b) (7)(C) was earning (b) (6), (b) (7)(C).

SA (b) (6), (b) (7)(C) reviewed Plumas Bank Records for Alturas account # (b) (6), (b) (7)(C) and # (b) (6), (b) (7)(C), obtained via EPA OIG Inspector General Subpoena (Attachment 1).

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
March 24, 2020

INTERVIEWEE (if applicable):
Interviewee

DRAFTED DATE:
March 27, 2020

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 1 of 2

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The review revealed the following:

- (b) (5), (b) (7)(E)

-

-

AMOUNT	(b) (6), (b) (7)(C) PAYEE	MEMO	DATE WRITTEN	AMOUNT - 1841 PAYEE	MEMO	DATE WRITTEN
(b) (6), (b) (7)(C), (b) (4)						

Nothing further.

Attachment(s):

1. Excel Sheet – Alturas Account # (b) (6), (b) (7)(C) & # (b) (6), (b) (7)(C)



(b) (6), (b) (7)(C)
Billing.xlsx

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
March 24, 2020

INTERVIEWEE (if applicable):
Interviewee

DRAFTED DATE:
March 27, 2020

AGENT(S):

(b) (6), (b) (7)(C)

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

75 HAWTHORNE ST IGI-1
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #:

TITLE: (b) (6), (b) (7)(C) (ET.AL.), Alturas, California

INTERVIEWEE (if applicable): N.A.

PREPARED BY: (b) (6), (b) (7)(C)

**MEMORANDUM OF ACTIVITY
CASE TITLE CHANGE**

NARRATIVE: On June 26, 2015, the EPA OIG Hotline received a complaint alleging that the Alturas Rancheria Tribe (Alturas) overdrew Grant #GA00T128010 and did not have any documentation to support its expenditure of EPA funds. A review of the EPA drawdown records indicated (b) (6), (b) (7)(C) Alturas, drew down \$124,400 and \$200,000 on September 16, 2014 and October 15, 2014, respectively. The last two withdrawals totaling \$324,400 were deposited into Alturas' main bank account co-mingled with other streams of revenue. (b) (6), (b) (7)(C)

The review of bank records revealed a pattern of negotiating cashier's checks. (b) (6), (b) (7)(C)

[REDACTED]

The investigation has now identified (b) (6), (b) (7)(C) as subjects (b) (7)(E), (b) (5) [REDACTED]. The title of this case is now changed to "(b) (6), (b) (7)(C) (ET. AL.), Alturas, California".

CASE: OI-SA-2015-CFR-0104

INTERVIEWEE (if applicable): N.A.

DATE OF ACTIVITY: 02/04/2020

DRAFTED DATE: 02/04/2020

AGENT(S):

(b) (6), (b) (7)(C)

RESTRICTED INFORMATION

Page 1 of 1

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
75 HAWTHORNE STREET
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #: Case number

TITLE: (b) (6), (b) (7)(C), ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable): Interviewee

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
EMAIL REVIEW

SUBJECT: Email from U.S. Department of Treasury Regarding the ASAP.gov Process

On September 30, 2019, Special Agent (b) (6), (b) (7)(C), OIG, Office of Investigations, received an email from (b) (6), (b) (7)(C), Program Analyst, Diversified Payment Services Branch, Fiscal Services, U.S. Department of Treasury, (b) (6), (b) (7)(C). The email contained the exact step-by-step instructions for Automated Standard Application for Payments (ASAP).gov.

Special Agent Note: ASAP.gov is a completely electronic system that federal agencies use to quickly and securely transfer money to recipient organizations. In this case, Alturas Indian Rancheria (Alturas) was awarded an EPA grant and was enrolled in ASAP.gov to drawdown money in accordance with grant rules and regulations (b) (6), (b) (7)(C). Alturas, Alturas, CA, was the sole person registered as the initiator for the EPA drawdowns on GA-00T12801-1.

According to (b) (6), (b) (7)(C), the following are the steps to request and receive money from ASAP.gov:

Step 1: Recipient Organization users (RO User) accesses ASAP via www.asap.gov using their userid and password.

Step 2: RO User acknowledges that they are "accessing a government information system that contains Sensitive but Unclassified information. You should treat any information removed from this system, either in digital or print format, in accordance

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
September 30, 2019

RESTRICTED INFORMATION
Page 1 of 2

INTERVIEWEE (if applicable):
Interviewee

DRAFTED DATE:
January 22, 2020

AGENT(S):
(b) (6), (b) (7)(C)

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with your agency's or organization's policies relating to the protection and handling of Sensitive but Unclassified (SBU) information.”

Step 3: RO User selects “Initiate Payment Request” from the Payment Request menu list

Step 4: RO User “Retrieves Accounts” (1... n) to select from which to initiate the payment request. Included in this step is specifying to which bank account (previously defined in the enrollment process) the request will be settled; Payment Request Type (Individual or Summary); Payment Method (ACH or Fedwire); Requested Settlement Date; and any Reference Information they wish to associate with the request (optional)

Step 5: RO User enters the dollar value of the payment request in a field next to the account name (dollar value cannot exceed the balance in the account, or any constraints defined by the federal agency)

Step 6: RO User is asked to review and confirm the payment request specifics defined in the previous step and must use a mouse click to submit the payment request.

Step 7: RO User is presented with a payment transaction confirmation page that includes the account ID, the Account Status, the optional reference information (defined in Step 4 above), the resulting account balance after the payment request, the amount requested, and the payment request status.

Nothing further.

Attachment(s):

None

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
September 30, 2019

RESTRICTED INFORMATION
Page 2 of 2

INTERVIEWEE (if applicable):
Interviewee

DRAFTED DATE:
January 22, 2020

AGENT(S):
(b) (6), (b) (7)(C)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL

75 HAWTHORNE ST IGI-1
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #: Case number

TITLE: (b) (6), (b) (7)(C) ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable): (b) (6), (b) (7)(C)

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
INTERVIEW

NARRATIVE: On (b) (6), (b) (7)(C) 2019, Special Agent (SA) (b) (6), (b) (7)(C) and SA (b) (6), (b) (7)(C), conducted an interview of (b) (6), (b) (7)(C) Alturas Indian Rancheria (Alturas), P.O. Box 967, Janesville, CA 96114. The purpose of the interview was to gather information regarding potential embezzlement of Alturas funds to include EPA Grant funds, (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C) The SAs properly identified themselves, explained the nature of the interview, and informed (b) (6), (b) (7)(C) that the interview was being recorded. (b) (6), (b) (7)(C) consented to the recording. The following information is a summary of the recorded interview:

Time stamp 01:35 - (b) (6), (b) (7)(C)

02:20 - (b) (6), (b) (7)(C) said in 2012, Alturas entered into a settlement agreement to resolve a tribal dispute among members. (b) (6), (b) (7)(C) explain prior to the 2012 settlement agreement the Business Committee was comprised of five members. The members were (b) (6), (b) (7)(C)

03:26 - (b) (6), (b) (7)(C)

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
(b) (6), (b) (7)(C), 2019

INTERVIEWEE (if applicable):
(b) (6), (b) (7)(C)

DRAFTED DATE:
November 4, 2019

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 1 of 5

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(b) (6), (b) (7)(C)

03:50 - (b) (6), (b) (7)(C) said (b) (6), (b) (7)(C)

This led to the first dispute.

04:05 - The dispute was settled in 2012, (b) (6), (b) (7)(C)

05:00 - (b) (6), (b) (7)(C) said when they (Alturas) settled in 2012, (b) (6), (b) (7)(C)

What led to the dispute in 2014 was (b) (6), (b) (7)(C)
started to disagree on issues. (b) (6), (b) (7)(C)

06:00 - (b) (6), (b) (7)(C)

06:18 - (b) (6), (b) (7)(C)

06:35 - (b) (6), (b) (7)(C)

07:30 - (b) (6), (b) (7)(C)

07:55 - (b) (6), (b) (7)(C)

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
(b) (6), (b) (7)(C) 2019

RESTRICTED INFORMATION
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INTERVIEWEE (if applicable):
(b) (6), (b) (7)(C)

DRAFTED DATE:
November 4, 2019

AGENT(S):
(b) (6), (b) (7)(C)

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(b) (6), (b) (7)(C)

08:30 - (b) (6), (b) (7)(C)
first tribal settlement was in 2012. (b) (6), (b) (7)(C)

09:25 - (b) (6), (b) (7)(C), (b) (5), (b) (4)

Special Agent Note: (b) (6), (b) (7)(C), (b) (5), (b) (4)

14:30 - (b) (6), (b) (7)(C), (b) (5), (b) (4)

17:15 - (b) (6), (b) (7)(C), (b) (5), (b) (4)

25:15 - (b) (6), (b) (7)(C), (b) (5), (b) (4)

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
(b) (6), (b) (7)(C), 2019

INTERVIEWEE (if applicable):

(b) (6), (b) (7)(C)

DRAFTED DATE:
November 4, 2019

AGENT(S):
(b) (6), (b) (7)(C)

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(b) (6), (b) (7)(C)

26:57 - (b) (6), (b) (7)(C)

28:00 - (b) (6), (b) (7)(C)

28:58 - (b) (6), (b) (7)(C)

32:00 - (b) (6), (b) (7)(C)

34:22 - (b) (6), (b) (7)(C)

35:20 - (b) (6), (b) (7)(C)

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
(b) (6), (b) (7)(C), 2019

INTERVIEWEE (if applicable):

(b) (6), (b) (7)(C)

DRAFTED DATE:
November 4, 2019

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
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Special Agent Note: (b) (6), (b) (7)(C), (b) (7)(E), (b) (5)

37:26 - (b) (6), (b) (7)(C) had no knowledge of the EPA grant or funding. (b) (6), (b) (7)(C) had heard "rumblings" about them (NFI) applying for grants and EPA may have been one of them. The first (b) (6), (b) (7)(C) learned about an EPA grant was when Alturas received an email from EPA questioning drawdowns by (b) (6), (b) (7)(C).

41:10 - (b) (6), (b) (7)(C) Alturas received the EPA grant (b) (6), (b) (7)(C)

No further pertinent information was provided, and the interview concluded. (b) (6), (b) (7)(C) would be available for follow up.

Attachment:

None.

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
(b) (6), (b) (7)(C), 2019

INTERVIEWEE (if applicable):
(b) (6), (b) (7)(C)

DRAFTED DATE:
November 4, 2019

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL

75 HAWTHORNE ST IGI-1
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #: Case number

TITLE: (b) (6), (b) (7)(C) ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable): (b) (6), (b) (7)(C)

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
RECORDS REVIEW

NARRATIVE: On (b) (6), (b) (7)(C) 2019, Special Agent (SA) (b) (6), (b) (7)(C) and SA (b) (6), (b) (7)(C), conducted an interview of (b) (6), (b) (7)(C), (b) (6), (b) (7)(C). The purpose of the interview was to gather information regarding potential embezzlement of Alturas funds to include EPA Grant funds. (b) (6), (b) (7)(C)

The agents properly identified themselves, explained the nature of the interview, and informed (b) (6), (b) (7)(C) that the interview was being recorded. (b) (6), (b) (7)(C) consented to the recording. The following information is a summary of the recorded interview:

1:00 - (b) (6), (b) (7)(C)

1:38 - (b) (6), (b) (7)(C) Alturas does not have an Executive Council. (b) (6), (b) (7)(C) Alturas has a Business Committee, which is comprised of three people: (b) (6), (b) (7)(C)

he Business Committee members are federally recognized in court (b) (6), (b) (7)(C)

1:57 - (b) (6), (b) (7)(C)

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
(b) (6), (b) (7)(C) 2019

INTERVIEWEE (if applicable):
(b) (6), (b) (7)(C)

DRAFTED DATE:
October 17, 2019

AGENT(S):
(b) (6), (b) (7)(C)

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2:25 - When asked who was on the Business Committee in 2014-2015, (b) (6), (b) (7)(C) said Alturas had a tribal dispute in 2012 that was settled in federal court with Judge Lawrence K. Karlton (deceased) presiding. (b) (6), (b) (7)(C) said the ruling recognized the Business Committee and the governing body for Alturas. (b) (6), (b) (7)(C)

2:25 - (b) (6), (b) (7)(C) since the settlement in 2012, the Business Committee has remained the same and never unrecognized. In 2014, the Bureau of Indian Affairs (BIA) reaffirmed the Business Committee was comprised of (b) (6), (b) (7)(C) . (b) (6), (b) (7)(C), (b) (5)

5:30 - (b) (6), (b) (7)(C), (b) (5)

6:25 - (b) (6), (b) (7)(C), (b) (5)

7:30 - (b) (6), (b) (7)(C), (b) (5)

8:30 - (b) (6), (b) (7)(C), (b) (5)

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
(b) (6), (b) (7)(C), 2019

INTERVIEWEE (if applicable):

(b) (6), (b) (7)(C)

DRAFTED DATE:
October 17, 2019

AGENT(S):
(b) (6), (b) (7)(C)

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(b) (6), (b) (7)(C), (b) (5)

10:19 - (b) (6), (b) (7)(C), (b) (5)

10:58 - (b) (6), (b) (7)(C), (b) (5)

11:30 - (b) (6), (b) (7)(C), (b) (5)

12:15 - (b) (6), (b) (7)(C), (b) (5)

13:10 - (b) (6), (b) (7)(C), (b) (5)

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
(b) (6), (b) (7)(C) 2019

INTERVIEWEE (if applicable):

(b) (6), (b) (7)(C)

DRAFTED DATE:
October 17, 2019

AGENT(S):

(b) (6), (b) (7)(C)

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14:50 - (b) (6), (b) (7)(C), (b) (5)

15:30 - (b) (6), (b) (7)(C), (b) (5)

Special Agent Note: (b) (6), (b) (7)(C), (b) (5)

21:25 - (b) (6), (b) (7)(C) Alturas had an EPA grant awarded (b) (6), (b) (7)(C) received a letter from (b) (6), (b) (7)(C), Grants Manager, EPA Region 9, San Francisco, CA.

22:30 - (b) (6), (b) (7)(C), (b) (5)

24:05 - (b) (6), (b) (7)(C), (b) (5)

25:15 - (b) (6), (b) (7)(C), (b) (5)

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
(b) (6), (b) (7)(C), 2019

INTERVIEWEE (if applicable):

(b) (6), (b) (7)(C)

DRAFTED DATE:
October 17, 2019

AGENT(S):
(b) (6), (b) (7)(C)

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25:55 - (b) (6), (b) (7)(C), (b) (5)

26:17 - (b) (6), (b) (7)(C), (b) (5)

30:30 - (b) (6), (b) (7)(C), (b) (5)

30:40 - (b) (6), (b) (7)(C), (b) (5)

Special Agent Note: (b) (6), (b) (7)(C), (b) (5)

31:15 - (b) (6), (b) (7)(C), (b) (5)

38:50 - (b) (6), (b) (7)(C), (b) (5)

No further pertinent information was provided, and the interview concluded. (b) (6), (b) (7)(C) would be available for follow up.

Attachment(s):

None.

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
(b) (6), (b) (7)(C) 2019

INTERVIEWEE (if applicable):

(b) (6), (b) (7)(C)

DRAFTED DATE:
October 17, 2019

AGENT(S):
(b) (6), (b) (7)(C)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL

75 HAWTHORNE STREET
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #: Case number

TITLE: (b) (6), (b) (7)(C) ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable): Interviewee

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
DOCUMENT REVIEW

SUBJECT: Review of Email from (b) (6), (b) (7)(C)

On October 4, 2019, Special Agent (b) (6), (b) (7)(C), OIG, Office of Investigations, received an email with attachments from (b) (6), (b) (7)(C). The email was a forwarded email from (b) (6), (b) (7)(C) later identified as (b) (6), (b) (7)(C) with an explanation of (b) (6), (b) (7)(C) agreement and voting rights with Alturas (Attachment 1).

The email contained six attachments.

1. Email from (b) (6), (b) (7)(C), dated October 4, 2019 to SA (b) (6), (b) (7)(C) Alturas – (b) (6), (b) (7)(C) (corrupt and not attached to this report)
2. (b) (6), (b) (7)(C).pdf
3. (b) (6), (b) (7)(C) Agreement.pdf
4. (b) (6), (b) (7)(C) Declaration.pdf
5. (b) (6), (b) (7)(C) Email Re (b) (6), (b) (7)(C) Voting and Agreement.pdf
6. Agreement between (b) (6), (b) (7)(C) and Alturas Rancheria.pdf

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
October 4, 2019

INTERVIEWEE (if applicable):
Interviewee

DRAFTED DATE:
October 10, 2019

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
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EMAIL REVIEW PART 1:

In the narrative of the email from (b) (6), (b) (7)(C) writes the following:

(b) (6), (b) (7)(C)

A review of Attachment 2 (b) (6), (b) (7)(C).pdf and Attachment 3 (b) (6), (b) (7)(C) Agreement" revealed the following differences:

(b) (6), (b) (7)(C), (b) (5)		

Special Agent Note: (b) (6), (b) (7)(C), (b) (5)

EMAIL REVIEW PART 2:

Further in the narrative of the email, (b) (6), (b) (7)(C) writes:

(b) (6), (b) (7)(C)

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
October 4, 2019

INTERVIEWEE (if applicable):
Interviewee

DRAFTED DATE:
October 10, 2019

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 2 of 5

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(b) (6), (b) (7)(C)

A review of Attachment 4 “(b) (6), (b) (7)(C) Declaration.pdf” under paragraph 6, revealed a statement from (b) (6), (b) (7)(C) Alturas, Alturas, CA., that (b) (6), (b) (7)(C) and executed a revised document (Resolution) with (b) (6), (b) (7)(C) (Attachment 6).

A review of Attachment 3 “(b) (6), (b) (7)(C) Agreement -dated July 5, 2012” and Attachment 6 “Agreement between (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) -dated July 6, 2012” revealed the following differences:

(b) (6), (b) (7)(C), (b) (5)	

Special Agent Note: (b) (6), (b) (7)(C), (b) (5)

EMAIL REVIEW PART 3:

(b) (6), (b) (7)(C) writes the following:

(b) (6), (b) (7)(C)

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
October 4, 2019

INTERVIEWEE (if applicable):
Interviewee

DRAFTED DATE:
October 10, 2019

AGENT(S):

(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 3 of 5

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A review of the email from (b) (6), (b) (7)(C) to (b) (6), (b) (7)(C) confirmed a statement (b) (6), (b) (7)(C) (Attachment 5). Below is a copy of the email:

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

Nothing further.

Attachment(s):

1. Email from (b) (6), (b) (7)(C), dated October 4, 2019 to SA (b) (6), (b) (7)(C)



#1Fwd_ (b) (6), (b) (7)(C)
Agreement.pdf

2. (b) (6), (b) (7)(C).pdf



(b) (6), (b) (7)(C)

3. (b) (6), (b) (7)(C) Agreement.pdf



(b) (6), (b) (7)(C)
Agreement.pdf

4. (b) (6), (b) (7)(C) Declaration.pdf

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
October 4, 2019

RESTRICTED INFORMATION
Page 4 of 5

INTERVIEWEE (if applicable):
Interviewee


DRAFTED DATE:
October 10, 2019

AGENT(S):
(b) (6), (b) (7)(C)

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#4 (b) (6), (b) (7)(C)
D

5. (b) (6), (b) (7)(C) Email Re (b) (6), (b) (7)(C) Voting and Agreement.pdf


#5 (b) (6), (b) (7)(C) Email Re
(b) (6), (b) (7)(C) Voting and Agree

6. Agreement between (b) (6), (b) (7)(C) and Alturas Rancheria.pdf


#6Agre
between (b) (6), (b) (7)(C)

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
October 4, 2019

RESTRICTED INFORMATION

Page 5 of 5

INTERVIEWEE (if applicable):
Interviewee

DRAFTED DATE:
October 10, 2019

AGENT(S):
(b) (6), (b) (7)(C)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL

1200 SIXTH AVENUE
SEATTLE, WA 98101

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #: Case number

TITLE: (b) (6), (b) (7)(C) ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable): Interviewee

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
RECORDS REVIEW

NARRATIVE: On September 27, 2019, Special Agent (SA) (b) (6), (b) (7)(C) conducted a review of checks provided to (b) (6), (b) (7)(C) Alturas Indian Rancheria (Alturas), P.O. Box 967, Janesville, CA 96114, by (b) (6), (b) (7)(C)

Alturas. (b) (6), (b) (7)(C), (b) (5)

In an interview of (b) (6), (b) (7)(C) dated September 24, 2019 (Attachment 1) (b) (6), (b) (7)(C) stated the following:

(b) (6), (b) (7)(C), (b) (5)

CASE:
OI-SA-2015-CFR-0104
DATE OF ACTIVITY:
September 27, 2019

INTERVIEWEE (if applicable):
NA
DRAFTED DATE:
October 1, 2019

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 1 of 3

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(b) (6), (b) (7)(C), (b) (5)

A review of Plumas Bank financial records obtained via EPA Inspector General subpoena revealed the following:

- On September 18, 2014, (b) (6), (b) (7)(C) was issued 3 checks totaling (b) (4), (b) (6), (b) (7)(C) from the Alturas Bank Account (b) (6), (b) (7)(C). All three checks were signed by (b) (6), (b) (7)(C).

A review of documents provided by (b) (6), (b) (7)(C) Alturas, during an interview dated (b) (6), (b) (7)(C) 2019 revealed the following:

- From December 2014 to January 2016, (b) (6), (b) (7)(C) was issued 18 checks totaling (b) (4), (b) (6), (b) (7)(C) from (b) (6), (b) (7)(C).
- From February 2016 to March 2016, (b) (6), (b) (7)(C) was issued 2 checks totaling (b) (4), (b) (6), (b) (7)(C) from (b) (6), (b) (7)(C).

CASE:
OI-SA-2015-CFR-0104
DATE OF ACTIVITY:
September 27, 2019

INTERVIEWEE (if applicable):
NA
DRAFTED DATE:
October 1, 2019

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 2 of 3

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- On April 4, 2016, (b) (6), (b) (7)(C) was issued a check in the amount of (b) (4), (b) (6), (b) (7)(C) from (b) (6), (b) (7)(C).

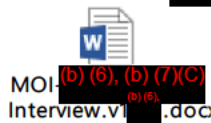
SA (b) (6), (b) (7)(C) made copies of the checks issued to (b) (6), (b) (7)(C) for further review and analysis (Attachment 2). The copies of these checks were then used to complete a spreadsheet (Attachment 3), which revealed the following information:

- The review of the checks identified \$ (b) (4), (b) (6), (b) (7)(C) in payments (b) (6), (b) (7)(C)
- Of the (b) (4), (b) (6), (b) (7)(C) payments (b) (6), (b) (7)(C), 13 individual checks were for (b) (4), (b) (6), (b) (7)(C) or over.

Nothing further.

Attachments:

- Interview of (b) (6), (b) (7)(C) dated (b) (6), (b) (7)(C) 2016.



- Copies of checks issued to (b) (6), (b) (7)(C), dated September 18, 2014-April 4, 2016.



- Spreadsheet of Checks issued to (b) (6), (b) (7)(C), dated September 27, 2019.



CASE:
OI-SA-2015-CFR-0104
DATE OF ACTIVITY:
September 27, 2019

INTERVIEWEE (if applicable):
NA
DRAFTED DATE:
October 1, 2019

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL

1200 SIXTH AVENUE
SEATTLE, WA 98101

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #: Case number

TITLE: (b) (6), (b) (7)(C) ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable): (b) (6), (b) (7)(C)

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
INTERVIEW

NARRATIVE: On (b) (6), (b) (7)(C), Special Agent (SA) (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) and SA (b) (6), (b) (7)(C) (b) (6), (b) (7)(C), conducted an interview of (b) (6), (b) (7)(C). The purpose of the interview was to gather information regarding potential embezzlement of Alturas funds to include EPA Grant funds, (b) (6), (b) (7)(C). The agents properly identified themselves, explained the nature of the interview, and informed (b) (6), (b) (7)(C) the interview was being recorded. (b) (6), (b) (7)(C) consented to the recording. The following information is a summary of the recorded interview:

Time Stamp 01:15 - (b) (6), (b) (7)(C), (b) (5)

CASE:
OI-SA-2015-CFR-0104

INTERVIEWEE (if applicable): (b) (6), (b) (7)(C)

DATE OF ACTIVITY:
(b) (6), (b) (7)(C) 2019

DRAFTED DATE:
October 1, 2019

AGENT(S):
(b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 1 of 5

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(b) (6), (b) (7)(C), (b) (5)

04:10 – (b) (6), (b) (7)(C), (b) (5)

(b) (6), (b) (7)(C), (b) (5)

09:00 – (b) (6), (b) (7)(C), (b) (5)

09:45 – (b) (6), (b) (7)(C), (b) (5)

(b) (6), (b) (7)(C), (b) (5)

12:45 – (b) (6), (b) (7)(C), (b) (5)

CASE:
OI-SA-2015-CFR-0104

INTERVIEWEE (if applicable): (b) (6), (b) (7)(C)

DATE OF ACTIVITY:
(b) (6), (b) (7)(C) 2019

DRAFTED DATE:
October 1, 2019

AGENT(S):
(b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
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14:00 - (b) (6), (b) (7)(C), (b) (5)

15:50 - (b) (6), (b) (7)(C), (b) (5)

16:45 - (b) (6), (b) (7)(C), (b) (5)

17:52 - (b) (6), (b) (7)(C), (b) (5)

18:25 - (b) (6), (b) (7)(C), (b) (5)

19:45 - (b) (6), (b) (7)(C), (b) (5)

CASE:
OI-SA-2015-CFR-0104

INTERVIEWEE (if applicable): (b) (6), (b) (7)(C)

DATE OF ACTIVITY:
(b) (6), (b) (7)(C), 2019

DRAFTED DATE:
October 1, 2019

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 3 of 5

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21:45 – (b) (6), (b) (7)(C), (b) (5)

25:20 – (b) (6), (b) (7)(C), (b) (5)

26:50 – (b) (6), (b) (7)(C), (b) (5)

27:30 – (b) (6), (b) (7)(C), (b) (5)

28:00 – (b) (6), (b) (7)(C), (b) (5)

Special Agent Note: At 33:22 minutes into the interview the battery on the recorder died and another recorder was used to complete the interview.

00:50 – (b) (6), (b) (7)(C), (b) (5)

CASE:
OI-SA-2015-CFR-0104

INTERVIEWEE (if applicable): (b) (6), (b) (7)(C)

DATE OF ACTIVITY:
(b) (6), (b) (7)(C), 2019

DRAFTED DATE:
October 1, 2019

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 4 of 5

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(b) (6), (b) (7)(C), (b) (5)

01:45 – (b) (6), (b) (7)(C) provided (b) (6), (b) (7)(C)'s phone number (b) (6), (b) (7)(C). (b) (6), (b) (7)(C) stated that (b) (6), (b) (7)(C) lived in (b) (6), (b) (7)(C).

02:15 – (b) (6), (b) (7)(C), (b) (5)

3:50 – (b) (6), (b) (7)(C), (b) (5)

6:15 – (b) (6), (b) (7)(C), (b) (5)

(b) (6), (b) (7)(C) did not have anything further to provide and the interview concluded. (b) (6), (b) (7)(C) agreed to be available for a follow up interview if needed.

Nothing further.

Attachment(s):

None.

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
(b) (6), (b) (7)(C) 2019

INTERVIEWEE (if applicable): (b) (6), (b) (7)(C)

DRAFTED DATE:
October 1, 2019

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
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Confirmation of Receipt of Preservation Request (OI-SA-2015-CFR-0104), GDG
Reference No. (b) (7)(E)

compliancemgr@godaddy.com

Fri 9/27/2019 7:15 AM

To: (b) (6), (b) (7)(C)

To Whom It May Concern,

Thank you for your request to our Subpoena Compliance Department. This will serve to confirm receipt of your preservation request.

If you have any questions, please review our Subpoena Policy at <https://www.godaddy.com/legal/agreements/subpoena-policy>.

Sincerely,

GoDaddy.com, LLC Subpoena Compliance Department

U.S. Environmental Protection Agency
Office of Inspector General
Office of Investigations
Seattle Field Office
1200 6th Ave., Suite 155
M/C 17-H13
Seattle, WA 98101



To Compliance Department
GoDaddy.com, LLC

Fax 480-624-2546

From (b) (6), (b) (7)(C)
Special Agent

Voice (b) (6), (b) (7)(C)

Fax (b) (6), (b) (7)(C)

Date September 18, 2019

Pages 3, including this page

Subject Preservation letter under 18 U.S.C. § 2703(f); Case # OI-SA-2015-CFR-0104



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS
SAN FRANCISCO FIELD OFFICE

SAN FRANCISCO OFFICE
75 Hawthorne St. (IGI-1)
San Francisco, CA 94105
415-947-4500

DENVER OFFICE
1505 Wynkoop St., 4th Fl.
Denver, CO 80202
303-312-6815

SEATTLE OFFICE
1200 Sixth Ave., OIG-173
Seattle, WA 98101
206-553-6116

September 18, 2019

GoDaddy.com, LLC
14455 N. Hayden Rd., Suite 219
Scottsdale, AZ 85260

Attn: Compliance Department

Re: Request for Preservation of Records

Dear GoDaddy.com, LLC:

Pursuant to Title 18, United States Code, Section 2703(f), this letter is a formal request for the preservation of all stored communications, records, and other evidence in your possession regarding the following email account(s) pending further legal process: (b) (6), (b) (7)(C) "the Account").

I request that you not disclose the existence of this request to the subscriber or any other person, other than as necessary to comply with this request. If compliance with this request might result in a permanent or temporary termination of service to the Account, or otherwise alert any user of the Account as to your actions to preserve the information described below, please contact me as soon as possible and before taking action.

I request that you preserve, for a period of 90 days, the information described below currently in your possession in a form that includes the complete record. This request applies only retrospectively. It does not in any way obligate you to capture and preserve new information that arises after the date of this request. This request applies to the following items, whether in electronic or other form, including information stored on backup media, if available:

(b) (7)(E)

(b) (7)(E)



If you have questions regarding this request, please contact me at (b) (6), (b) (7)(C) or (b) (6), (b) (7)(C)

Sincerely

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

Special Agent in Charge

U.S. Environmental Protection Agency
Office of Inspector General
Office of Investigations
Seattle Field Office
1200 6th Ave., Suite 155
M/C 17 H13
Seattle, WA 98101



To Oath Custodian of Records
Oath Inc.

Email lawenforcement@teamaol.com

From (b) (6), (b) (7)(C)
Special Agent

Voice (b) (6), (b) (7)(C)

Email (b) (6), (b) (7)(C)

Date September 18, 2019

Pages 3, including this page

Subject Preservation letter under 18 U.S.C. § 2703(f); Case # OI SA 2015 CFR 0104



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS
SAN FRANCISCO FIELD OFFICE

SAN FRANCISCO OFFICE
75 Hawthorne St. (IGI-1)
San Francisco, CA 94105
415-947-4500

DENVER OFFICE
1595 Wynkoop St., 4th Fl.
Denver, CO 80202
303-312-6815

SEATTLE OFFICE
1200 Sixth Ave., OIG-173
Seattle, WA 98101
206-553-6116

September 18, 2019

Oath Inc.
22000 AOL Way
Dulles, VA 20166

Attn: Oath Custodian of Records
Email: lawenforcement@teamaol.com

Re: Request for Preservation of Records

Dear Oath Inc.:

Pursuant to Title 18, United States Code, Section 2703(f), this letter is a formal request for the preservation of all stored communications, records, and other evidence in your possession regarding the following email account(s) pending further legal process: (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) ("the Account").

I request that you not disclose the existence of this request to the subscriber or any other person, other than as necessary to comply with this request. If compliance with this request might result in a permanent or temporary termination of service to the Account, or otherwise alert any user of the Account as to your actions to preserve the information described below, please contact me as soon as possible and before taking action.

I request that you preserve, for a period of 90 days, the information described below currently in your possession in a form that includes the complete record. This request applies only retrospectively. It does not in any way obligate you to capture and preserve new information that arises after the date of this request. This request applies to the following items, whether in electronic or other form, including information stored on backup media, if available:

(b) (7)(E)

(b) (7)(E)



If you have questions regarding this request, please contact me at (b) (6), (b) (7)(C) or
(b) (6), (b) (7)(C)

Sincerely,

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

Special Agent in Charge

The attached fax was received from (b) (6), (b) (7)(C) on 9/18/2019 at 6:20:49 PM.

JobID: 187198

U.S. Environmental Protection Agency
Office of Inspector General
Office of Investigations
Seattle Francisco Field Office
75 Hawthorne Street
8th Floor, IGI-1
San Francisco, CA 94105



To Verizon Security Assistance Team
VSAT

Fax see notes

From (b) (6), (b) (7)(C)
Special Agent

Voice (b) (6), (b) (7)(C)

Fax (b) (6), (b) (7)(C)

Date September 18, 2019

Pages 3, including this page

Subject Preservation letter under 18 U.S.C. § 2703(f); Case # OI-SA-2015-CFR-0104



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS
SAN FRANCISCO FIELD OFFICE

SAN FRANCISCO OFFICE
75 Hawthorne St. (101-1)
San Francisco, CA 94104
415-947-4500

DENVER OFFICE
1595 Wynkoop St., 4th Fl.
Denver, CO 80202
303-312-0815

SEATTLE OFFICE
1300 Sixth Ave. 010-173
Seattle, WA 98101
206-553-6116

September 18, 2019

VSAT
180 Washington Valley Road
Bedminster, NJ 07921

Attn: Verizon Security Assistance Team

Re: Request for Preservation of Records

Dear VSAT:

Pursuant to Title 18, United States Code, Section 2703(f), this letter is a formal request for the preservation of all stored communications, records, and other evidence in your possession regarding the following cell phone number(s) pending further legal process: (b) (6), (b) (7)(C), (b) (6), (b) (7)(C), (b) (6), (b) (7)(C) ("the Account").

I request that you not disclose the existence of this request to the subscriber or any other person, other than as necessary to comply with this request. If compliance with this request might result in a permanent or temporary termination of service to the Account, or otherwise alert any user of the Account as to your actions to preserve the information described below, please contact me as soon as possible and before taking action.

I request that you preserve, for a period of 90 days, the information described below currently in your possession in a form that includes the complete record. This request applies only retrospectively. It does not in any way obligate you to capture and preserve new information that arises after the date of this request. This request applies to the following items, whether in electronic or other form, including information stored on backup media, if available:

(b) (7)(E)



(b) (7)(E)



If you have questions regarding this request, please contact me at (b) (6), (b) (7)(C) or
(b) (6), (b) (7)(C)

Signature
(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)
Special Agent in Charge

U.S. Environmental Protection Agency
Office of Inspector General
Office of Investigations
Seattle Francisco Field Office
75 Hawthorne Street
8th Floor, IGI-1
San Francisco, CA 94105



To Verizon Security Assistance Team
VSAT

Fax see notes

From (b) (6), (b) (7)(C)
Special Agent

Voice (b) (6), (b) (7)(C)

Fax (b) (6), (b) (7)(C)

Date September 18, 2019

Pages 3, including this page

Subject Preservation letter under 18 U.S.C. § 2703(f); Case # OI-SA-2015-CFR-0104



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
OFFICE OF INVESTIGATIONS
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SAN FRANCISCO OFFICE
75 Hawthorne St. (1G1-1)
San Francisco, CA 94105
415-947-4500

DENVER OFFICE
1595 Wynkoop St., 4th Fl.
Denver, CO 80202
303-312-6815

SEATTLE OFFICE
1200 Sixth Ave., OIG-173
Seattle, WA 98101
206-553-6116

September 18, 2019

VSAT
180 Washington Valley Road
Bedminster, NJ 07921

Attn: Verizon Security Assistance Team

Re: Request for Preservation of Records

Dear VSAT:

Pursuant to Title 18, United States Code, Section 2703(f), this letter is a formal request for the preservation of all stored communications, records, and other evidence in your possession regarding the following cell phone number(s) pending further legal process: (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) ("the Account").

I request that you not disclose the existence of this request to the subscriber or any other person, other than as necessary to comply with this request. If compliance with this request might result in a permanent or temporary termination of service to the Account, or otherwise alert any user of the Account as to your actions to preserve the information described below, please contact me as soon as possible and before taking action.

I request that you preserve, for a period of 90 days, the information described below currently in your possession in a form that includes the complete record. This request applies only retrospectively. It does not in any way obligate you to capture and preserve new information that arises after the date of this request. This request applies to the following items, whether in electronic or other form, including information stored on backup media, if available:

(b) (7)(E)



(b) (7)(E)



If you have questions regarding this request, please contact me at (b) (6), (b) (7)(C) or
(b) (6), (b) (7)(C)

Sincerely,
(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

Special Agent in Charge



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

1200 SIXTH AVENUE
SEATTLE, WA 98101

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #: Case number

TITLE: (b) (6), (b) (7)(C) ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable): Interviewee

PREPARED BY: (b) (6), (b) (7)(C)

**MEMORANDUM OF ACTIVITY
RECORDS REVIEW**

NARRATIVE: On September 4, 2019, Special Agent (SA) (b) (6), (b) (7)(C), OIG, Office of Investigations, conducted a review of bank records related to expenditures made by the Alturas Rancheria Indian Tribe (Alturas), Alturas, CA. The purpose of the review was to determine if the expenditures from the Alturas bank account were allowable under the EPA grant. The following information was obtained:

EPA awarded Alturas, grant award (GA)-00T12801-0 in the amount of \$75,000.00 to fund direct costs for General Assistance Program (GAP) related activities from October 1, 2013 to September 20, 2014 (Attachment 1). EPA amended the GA (GA-00T12801-1) and awarded Alturas Rancheria an additional \$324,400.00 to fund a) direct costs and eligible indirect costs for GAP related activities from October 1, 2014 to September 30, 2015, and b) eligible indirect costs incurred from October 1, 2013 through September 30, 2014, or a total award of \$399,400.00 (\$75,000+\$324,400) (Attachment 2). GA - 00T12801-1 stated that the Administrative and Programmatic Conditions would remain the same as they were under GA-00T12801-0. Attached to GA-00T12801-0 were applicable Administrative Conditions. The Administrative Conditions identified that the cost principles of 2 CFR 225 (OMB Circular A-87) (Attachment 3) were applicable to the award.

From September 16, 2014 through October 16, 2014 Alturas drew down \$324,400 (\$124,400+\$200,000) from the EPA Grant and had additional deposits of \$220,000 from other sources deposited into the Plumas Bank Account (b) (6), (b) (7)(C) for a total of \$544,400 (\$324,400+\$220,000) (Attachment 4). Prior to the drawdown the account balance was \$1,852.34. A review of the account transaction history revealed that from September 16, 2014

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
September 4, 2019

INTERVIEWEE (if applicable):
NA

DRAFTED DATE:
September 11, 2019

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 1 of 7

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Investments for (b) (6), (b) (7)(C) (Attachment 5). On September 24, 2014 a Counter Check in the

amount of \$100,000 was issued. Notes on the check stated “\$75,000 for safekeeping and \$25,000 to (b) (6), (b) (7)(C). On October 16, 2014 a Counter Check in the amount of \$186,000 was issued and a cashier's check was created and issued payable to (b) (6), (b) (7)(C). This investigation determined that the \$186,000 cashier's check was deposited into a Bank of America Account belonging to (b) (6), (b) (7)(C). The payments totaled \$543,603.24 (\$257,603.24+\$100,000+\$186,000).

The review determined that approximately \$498,018.04 of the \$543,603.24 in payments from the account were not allowable or allocable to the EPA Grant, because they failed to meet the requirements of OMB Circular A-87. Additionally, the remaining payments \$45,585.20 (\$543,603.24-\$498,018.04) are questionable due to lack of supporting documentation and are not supported by the Workplan and Quarterly Reports submitted to EPA by Alturas (Attachments 6 & 7).

Payments from the Alturas bank account are summarized below:

9/16/2014-10/31/2014

Category	Value
Category 1	Value 1
Category 2	Value 2
Category 3	Value 3
Category 4	Value 4
Category 5	Value 5
Category 6	Value 6
Category 7	Value 7
Category 8	Value 8

(b) (7)(E), (b) (4), (b) (6), (b) (7)(C), (b) (5)

██████████	██████████
██████████	██████████
██████████	██████████
████████████████████	██████████
	██████████

[illegible]

_____	_____
_____	_____
_____	_____

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

CASE:
OI-SA-2015-CFR-0104

INTERVIEWEE (*if applicable*):
NA

DATE OF ACTIVITY:
September 4, 2019

DRAFTED DATE:
September 11, 2019

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
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An in-depth review of the September 16, 2014 through October 31, 2014 Alturas payments totaling \$257,603.24 was conducted and revealed the following information:

Attachment 5-Salary and Fringe Tab

\$54,495.40 was paid in salary and fringe benefits on September 18, 2014. \$11,019.99 of the \$54,495.40 were paid to Alturas employees and tribal members for pay period September 1, 2014 - September 30, 2014. The remaining \$43,475.41 appears to be for fringe costs related to unemployment Insurance and taxes, but it is unclear what purpose and time period these amounts are attributed to. Additionally, the \$11,019.99 in salary payments were paid prior to the end of the pay period. \$98,889.94 in salary and fringe benefits for the period of October 1, 2014 through December 31, 2014 were paid to Alturas employees and tribal members on September 18, 2014. The \$98,889.94 was paid prior to the beginning of period of October 1, 2014 through December 31, 2014. Furthermore, (b) (6), (b) (7)(C)

ineligible for any salary and fringe benefits paid on their behalf by Alturas (Attachments 8 &9).

Federal regulations 2 CFR 225 (OMB Circular A-87) require that employee salaries and wages be properly documented and approved. Personnel Activity Reports or equivalent documentation must be prepared and meet the following criteria:

- Prepared at least monthly;
- Signed by the employee;
- Account for the total activity for which each employee is being compensated; and,
- Reflect an after-the-fact distribution of the work that has actually been completed by each employee.

Based on the review of the GA-00T12801-0 and GA-00T12801-1 Grant Applications, Grant Workplans, Quarterly Reports, and applicable federal regulations, at least \$109,909.83 (\$11,019.99+\$98,889.84) of the \$153,385.24 (\$54,495.40+\$98,889.84) in salary and fringe benefit payments would not be allowable or allocable to the EPA Grants.

Attachment 5-Legal Fees Tab

Legal fees totaling \$89,690.85 were paid by Alturas to several different law firms from September 18, 2014 to October 14, 2014. The only legal fees allowable under the EPA Grant for Alturas was the amount of \$1,500.00 listed under the GA - 00T12801-1 budget with the description of "Legal letter for ETEP from tribal attorney". A review of documentation provided by the EPA project officer revealed that some legal costs related to the legal letter for ETEP from

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September 4, 2019

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INTERVIEWEE (if applicable):
NA

DRAFTED DATE:
September 11, 2019

AGENT(S):
(b) (6), (b) (7)(C)

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tribal attorney may have been incurred in the 3rd quarter of FY 2015 and reported to EPA in a quarterly report on July 25, 2015. However, EPA did not receive a deliverable/letter signed by an attorney so this cost would not be allowable. A review of the GA - 00T12801-1 workplan and quarterly reports submitted by Alturas and summarized by the EPA project officer did not reveal any other direct costs or indirect costs related to legal fees.

According to 2 CFR 225 (OMB Circular A-87), legal salaries must be related to allowable indirect cost activities and be adequately documented and supported in in order to be included in the indirect cost pool. Only legal salaries (in-house attorneys) or legal costs (for contracted legal services) related to an allowable indirect cost activity and supported with adequate documentation will be eligible for inclusion in the indirect cost pool. Legal costs related solely to general government operations (an unallowable cost) or to direct cost activities (i.e., federal awards) are not allowable in the indirect cost pool. Contracted indirect legal services costs should be supported with billings or contract invoice documentation. Unallowable Legal Costs include costs related to the defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringements.

Based on the review of the GA-00T12801-0 and GA-00T12801-1 Grant Applications, Grant Workplans, Quarterly Reports, and applicable federal regulations, the \$89,690.36 in legal fee payments would not be allowable or allocable to the EPA Grants.

Attachment 5-Travel Tab

Travel costs totaling \$8,087.85 were paid by Alturas to (b) (6), (b) (7)(C) (\$5,000.00 on September 18, 2014) and (b) (6), (b) (7)(C) (\$3,087.85 on September 30, 2014). The only travel costs allowable under the EPA Grant for Alturas through September 30, 2014 was the amount of \$7,380.00 listed under the GA - 00T12801-0 budget. The \$7,380.00 in travel costs budgeted in GA - 00T12801-0 was for travel listed for the Environmental Director, (b) (6), (b) (7)(C).

2 CFR 225 (OMB Circular A-87) states that travel costs are allowable with the prior approval of an awarding agency when they are specifically related to Federal awards.

Based on the review of the GA-00T12801-0 and GA-00T12801-1 Grant Applications, Grant Workplans, Quarterly Reports, and applicable federal regulations, the \$8,087.85 in travel cost payments would not be allowable or allocable to the EPA Grants.

Attachment 5-Payments for (b) (6), (b) (7)(C) Tab

Costs totaling \$4,330.00 for childcare and investment funding for (b) (6), (b) (7)(C) were paid by Alturas in several payments dating from September 18, 2014 through September 30, 2014.

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INTERVIEWEE (if applicable):
NA

DRAFTED DATE:
September 11, 2019

AGENT(S):
(b) (6), (b) (7)(C)

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Under 2 CFR 225 (OMB Circular A-87) costs of goods or services for personal use of the governmental unit's employees are unallowable regardless of whether the cost is reported as taxable income to the employees.

Based on the review of the GA-00T12801-0 and GA-00T12801-1 Grant Applications, Grant Workplans, Quarterly Reports, and applicable federal regulations, \$4,330.00 for childcare and investment funding for (b) (6), (b) (7)(C) would not be allowable or allocable to the EPA Grants.

Attachment 5-Miscellaneous Tab

Miscellaneous costs totaling \$2,109.69 from September 16, 2014 through October 31, 2014 were reviewed. A determination of the allowability and allocability of these costs could not be determined due to lack of supporting documentation.

Counter Checks

A Counter Check a in the amount of \$100,000 with notes stating "\$75,000 for safekeeping and \$25,000 to (b) (6), (b) (7)(C) was issued on September 24, 2014. A Counter Check in the amount of \$186,000 with the note "protection of funds" was issued on October 16, 2014 and a cashier's check was created Check in the amount of \$186,000 and issued payable to (b) (6), (b) (7)(C).

Under 2 CFR 225 (OMB Circular A-87) defines that costs must be necessary and reasonable for proper and efficient performance and administration of Federal awards.

Based on the review of the GA-00T12801-0 and GA-00T12801-1 Grant Applications, Grant Workplans, Quarterly Reports, and applicable federal regulations the two Counter Checks of \$100,000 and \$186,000 would not be allowable or allocable to the EPA Grants.

Attachment 6-GAP Online Progress Report Work Plan Period: FY 2015

The GAP Online Progress Report Work Plan Period: FY 2015 documented that several of the components were not completed and behind schedule. The workplan only listed only the status of the first three out of four quarters (October 1, 2014 through June 30, 2014). The Tribe's FY 2015 work plan contained 14 commitments. Two were completed, six were partially completed, and six were left incomplete.

Attachment 7-Project Officer's Summary of Alturas' Quarterly Reports: FY 2015

The EPA Project officer determined that for FY2014 and FY 2015, the amount of funding related to incomplete work under the EPA Grant was at least \$220,364

Special Agent Note: The Project Officer noted that the total potential reimbursement is based on the value of work that was reported and the related deliverables. It is not based

CASE:
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DATE OF ACTIVITY:
September 4, 2019

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INTERVIEWEE (if applicable):
NA

DRAFTED DATE:
September 11, 2019

AGENT(S):
(b) (6), (b) (7)(C)

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on expenditure information because EPA did not have any reliable expenditure data to review.

Nothing further.

Attachments:

1. GA-00T12801-0 dated October 1, 2013 to September 20, 2014.



GA-00T12801-0.pdf

2. GA-00T12801-1 dated October 1, 2014 to September 20, 2015.



GA_00T12801_1_Alt
uras_Rancheria_GAF

3. OMB Circular A-87 Revised May 10, 2004



OMB CIRCULAR
A-87 REVISED _ The '

4. Alturas Plumas Bank Account (b) (6), (b) (7)(C) dated August 31, 2014- October 31, 2014



Alturas Bank
Statements.pdf

5. Spreadsheet of Alturas Bank Account Cost Review, dated September 4, 2019



September 16
through October Ex

6. GAP Online Progress Report Work Plan Period: FY 2015



report from go
170518.pdf

7. Project Officer's Summary of Alturas' Quarterly Reports: FY 2014- 2015



Alturas FY14-FY15
Progress documents

8. (b) (6), (b) (7)(C), 2014

CASE:
OI-SA-2015-CFR-0104

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September 4, 2019

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INTERVIEWEE (if applicable):
NA

DRAFTED DATE:
September 11, 2019

AGENT(S):
(b) (6), (b) (7)(C)

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(b) (6), (b) (7)(C)

9. (b) (6), (b) (7)(C) 2014



(b) (6), (b) (7)(C)

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
September 4, 2019

INTERVIEWEE (if applicable):
NA

DRAFTED DATE:
September 11, 2019

AGENT(S):
(b) (6), (b) (7)(C)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
75 HAWTHORNE STREET
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #: Case number

TITLE: (b) (6), (b) (7)(C) ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable): Interviewee

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
DOCUMENT REVIEW

SUBJECT: Review of Emails Communication from (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C)

On August 19, 2019, Special Agent (b) (6), (b) (7)(C), OIG, Office of Investigations, was given access to (b) (6), (b) (7)(C), (b) (5), (b) (7)(E)

The folder contained various files, to include all email communication from (b) (6), (b) (7)(C)

Below is a copy of all the emails in chronological order.

Special Agent Note: The emails were provided in two separate pdf files in reverse order (newest email to oldest): 1. (b) (6), (b) (7)(C) email communication; 2. (b) (6), (b) (7)(C) email communication. The highlighted emails derived from pdf #1 (b) (6), (b) (7)(C)) and the unlighted emails derived from pdf #2 (b) (6), (b) (7)(C)). See Attachment 1 & 2.

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
August 19, 2019

INTERVIEWEE (if applicable):
Interviewee

DRAFTED DATE:
September 11, 2019

AGENT(S):
(b) (6), (b) (7)(C)

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17 pages of extracted text from emails withheld under Exemptions 5, 6 and 7(C) to protect the deliberative process privilege and the privacy interests of individuals

Nothing further.

Attachment(s):

1. Emails to EPA involving (b) (6), (b) (7)(C) (Yellow highlights)



(b) (6), (b) (7)(C)

2. Emails to EPA involving (b) (6), (b) (7)(C) (No highlights)



(b) (6), (b) (7)(C)

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
August 19, 2019

INTERVIEWEE (if applicable):
Interviewee

DRAFTED DATE:
September 11, 2019

AGENT(S):

(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL

75 HAWTHORNE STREET
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #: Case number

TITLE: (b) (6), (b) (7)(C) ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable): Interviewee

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
DOCUMENT REVIEW

SUBJECT: Review of Email from (b) (6), (b) (7)(C), dated August 27, 2019

On August 27, 2019, Special Agent (SA) (b) (6), (b) (7)(C), OIG, Office of Investigations, contacted (b) (6), (b) (7)(C) Risk Management Officer, Plumas Bank, Alturas, California, (b) (6), (b) (7)(C), requesting a second review of a cashier's check #234212, dated October 16, 2014, and issued by Plumas Bank. On May 2, 2019, (b) (6), (b) (7)(C) indicated cashier's check #234212 was not negotiated, cashed or deposited.

On the same date, (b) (6), (b) (7)(C) emailed SA (b) (6), (b) (7)(C) and said (b) (6), (b) (7)(C) initially provided "mis-information" on May 2, 2019. The cashier's check was negotiated and deposited into a Bank of America (BoFA) account on October 16, 2014. (b) (6), (b) (7)(C) provided a copy of the tendered cashier's check. (Attachment 1)

A review of the cashier's check revealed it was paid to the order of (b) (6), (b) (7)(C) Alturas Indian Rancheria, and endorsed to BoFA Account (b) (6), (b) (7)(C).

Nothing further.

Attachment(s):

1. Email from (b) (6), (b) (7)(C), dated August 27, 2019



CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
August 27, 2019

INTERVIEWEE (if applicable):
Interviewee

DRAFTED DATE:
August 28, 2019

AGENT(S):
(b) (6), (b) (7)(C)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL

1200 SIXTH AVENUE
SEATTLE, WA 98101

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #: Case number

TITLE: (b) (6), (b) (7)(C) ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable): Interviewee

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
RECORDS REVIEW

NARRATIVE: On August 27, 2019, Special Agent (SA) (b) (6), (b) (7)(C) and SA (b) (6), (b) (7)(C) met with (b) (6), (b) (7)(C) Bank of America (BoFA), at (b) (6), (b) (7)(C), (b) (6), (b) (7)(C). The purpose of the meeting was to determine if (b) (6), (b) (7)(C), (b) (6), (b) (7)(C), (b) (6), (b) (7)(C) was the owner of a BoFA Account (b) (6), (b) (7)(C). The following information was obtained:

SA (b) (6), (b) (7)(C), provided SA (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) a copy of Cashier's Check 234212 (Check), dated October 16, 2014, and issued by Plumas Bank, 35 Lindan Ave, Quincy, CA 95971, in the amount of \$186,000.00 (Attachment 1). The Check was remitted by Alturas Indian Rancheria (Alturas), P.O. Box 967, Janesville, CA 96114, and paid to the order of (b) (6), (b) (7)(C). The Check was endorsed to BoFA Account (b) (6), (b) (7)(C).

(b) (6), (b) (7)(C) was asked if (b) (6), (b) (7)(C) could confirm whether (b) (6), (b) (7)(C) was the account owner of BoFA Account (b) (6), (b) (7)(C). (b) (6), (b) (7)(C) stated that (b) (6), (b) (7)(C) could confirm the information but could not provide any other details or documentation. (b) (6), (b) (7)(C) wrote down (b) (6), (b) (7)(C) name and BoFA Account (b) (6), (b) (7)(C), and briefly left to verify the information. (b) (6), (b) (7)(C) returned and confirmed that (b) (6), (b) (7)(C) was listed on BoFA Account (b) (6), (b) (7)(C). (b) (6), (b) (7)(C) provide the BoFA law enforcement support contact information as (800) 900-9044 and lawenforcementsupport@bankofamerica.com.

Nothing further. (Attachment is listed on next page)

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
August 27, 2019

INTERVIEWEE (if applicable):
NA

DRAFTED DATE:
August 27, 2019

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
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Attachments:

1. Cashier's Check 234212 dated October 16, 2014.



IMG_0149.jpg

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
August 27, 2019

INTERVIEWEE (if applicable):
NA

DRAFTED DATE:
August 27, 2019

AGENT(S):
(b) (6), (b) (7)(C)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL

75 HAWTHORNE STREET
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #: Case number

TITLE: (b) (6), (b) (7)(C) ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable): Interviewee

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
DOCUMENT REVIEW

SUBJECT: Review of Email from (b) (6), (b) (7)(C), dated June 26, 2019.

On June 26, 2019, Special Agent (b) (6), (b) (7)(C), OIG, Office of Investigations, received an EPA Fiscal Year 2015 End of the Year (EOY) Report for Alturas Rancheria Tribe. The report was provided via email by (b) (6), (b) (7)(C) EPA, Region 9, Yreka, CA., (b) (6), (b) (7)(C). The EOY report referenced an EPA General Assistance Program Grant # GA-00T12801-1 with a funding period between October 1, 2013 to September 30, 2014 for a total cumulative award amount of \$399,000. Below is a summary of the report.

The Rancheria made good progress in FY14. Funds expended were commensurate with work completed during that year. However, the Tribe's Environmental Program became inactive in FY15. We did not receive an interim Federal Financial Report (FFR) at the end of FY15 and are unable to determine grant expenditures for that year. Our end of year report for FY15 indicates the value of incomplete work is \$160,964. That amount of funding will need to be returned to the EPA if FY15 work plan commitments are not completed by the time the grant closes on September 30, 2017. We appreciate the work Alturas completed in FY14 and FY15 and look forward to assisting the Tribe as necessary.

FY14 (year 1) EPA Project Officer Summary

The Rancheria completed 10 commitments and partially completed two commitments. Alturas provided informative progress reports and completed some very important foundation documents

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
June 26, 2019

INTERVIEWEE (if applicable):
Interviewee

DRAFTED DATE:
July 11, 2019

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 1 of 2

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for their Environmental Program, including a Tribal Environmental Plan, Environmental Inventory and Integrated Solid Waste Management Plan. Expenditures were commensurate with progress.

FY15 (year 2) EPA Project Officer Summary

The Tribe's FY15 work plan contains 14 commitments. Two were completed, six were partially completed, and six were left incomplete. The Tribe's Program became inactive during FY15 due to an internal dispute. The EPA did not receive an interim FFR or a fourth quarter progress report. Justified expenditures totaled to \$50,936. The remaining funds (\$160,964) that were provided for FY15 work plan activities must be de-obligated or returned to the EPA if associated work plan commitments are not completed by the time the grant closes on 09/30/2017.

Attachment(s):

1. FY15 EOY Report – Alturas Rancheria



fy15 eoy report for
alturas rancheria.pdf

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
June 26, 2019

INTERVIEWEE (if applicable):
Interviewee

DRAFTED DATE:
July 11, 2019

AGENT(S):

(b) (6), (b) (7)(C)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
75 HAWTHORNE STREET, 7TH FLOOR
SAN FRANCISCO, CA 94105

June 19, 2019

(b) (6), (b) (7)(C)

Special Agent in Charge
4500 Orange Grove
Sacramento, CA 95841

Dear (b) (6), (b) (7)(C),

Pursuant to the Homeland Security Act of 2002, we are updating your Agency with new information on this investigation.

DATE OPENED: August 11, 2015

SUBJECT NAME: Alturas Rancheria Tribe

ADDRESS: P.O. Box 967
Janesville, CA 96114

CASE NUMBER: OI-SA-2015-CFR-0104

EPA CASE AGENT: (b) (6), (b) (7)(C)

ISSUE/ALLEGATION: This office has an on-going case regarding allegations of fraudulent activities by the Alturas Rancheria Tribe (ART). ART received a U.S. Environmental Protection Agency (EPA) grant for \$399,400 on August 7, 2013. According to EPA management, ART drew down \$324,400 in a lump sum without any support or justification. The funding was drawn down by (b) (6), (b) (7)(C) and was deposited into an account other than the Tribe's general account. The purpose of this letter is to inform your office that subjects have been identified: (b) (6), (b) (7)(C)

If you have any questions or wish to discuss this case in further detail, please contact the case agent, (b) (6), (b) (7)(C), at (b) (6), (b) (7)(C).

Sincerely,

(b) (6), (b) (7)(C)

Acting Special Agent in Charge



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

75 HAWTHORNE ST IGI-1
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #:

TITLE: (b) (6), (b) (7)(C) Alturas, California

INTERVIEWEE (if applicable): N.A.

PREPARED BY: (b) (6), (b) (7)(C)

**MEMORANDUM OF ACTIVITY
CASE TITLE CHANGE**

NARRATIVE: On June 26, 2015, the EPA OIG Hotline received a complaint alleging that the Alturas Rancheria Tribe (Alturas) overdrew Grant #GA00T128010 and did not have any documentation to support its expenditure of EPA funds. A review of the EPA drawdown records indicated (b) (6), (b) (7)(C) drew down \$124,400 and \$200,000 on September 16, 2014 and October 15, 2014, respectively. The last two withdrawals totaling \$324,400 were deposited into Alturas' main bank account co-mingled with other streams of revenue. (b) (6), (b) (7)(C)

The review of bank records revealed a pattern of negotiating cashier's checks. (b) (6), (b) (7)(C) frequently used cashier's checks to make large debits and deposits into the Tribes account. The pattern consisted of (b) (6), (b) (7)(C) withdrawing funds into cashier's checks, then returning later with the same cashier's check in which (b) (6), (b) (7)(C) then negotiated the check again by splitting it into different amounts for new cashier's checks.

(b) (6), (b) (7)(C), (b) (5)
The title of this case is now changed to (b) (6), (b) (7)(C) Alturas, California".

No further information.

CASE: OI-SA-2015-CFR-0104

INTERVIEWEE (if applicable): N.A.

DATE OF ACTIVITY: 06-13-2019

DRAFTED DATE: 06/13/2019

AGENT(S):

(b) (6), (b) (7)(C)

RESTRICTED INFORMATION

Page 1 of 1

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

75 HAWTHORNE ST IGI-1
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #:

TITLE: (b) (6), (b) (7)(C) ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable):

PREPARED BY: (b) (6), (b) (7)(C)

**MEMORANDUM OF ACTIVITY
SIGNIFICANT INCIDENT REPORT**

NARRATIVE: On June 13, 2019, Special Agent (SA) (b) (6), (b) (7)(C), U.S. EPA OIG, Office of Investigations (EPA OIG-OI), briefed (b) (6), (b) (7)(C), Assistant United States Attorney (AUSA), Eastern District of California, Sacramento Office, 501 I Street, Suite 10-100, Sacramento, California, (b) (6), (b) (7)(C), on this investigation. AUSA (b) (6), (b) (7)(C) was advised the EPA OIG-OI had initiated an investigation regarding allegations of grant misappropriation by Alturas Rancheria Tribe (Alturas). Alturas received an EPA grant for \$399,400 on August 8, 2013.

The investigation to date revealed \$324,400 in grant funds were drawn down in 2014 by (b) (6), (b) (7)(C) within a two-month period (b) (6), (b) (7)(C). The grant funds were deposited into the main Alturas account - co-mingled with other streams of revenue. A review of bank records revealed a pattern of negotiating cashier's checks. (b) (6), (b) (7)(C) frequently used cashier's checks to make large debits and deposits into the Tribes account. The pattern consisted of (b) (6), (b) (7)(C) withdrawing funds into cashier's checks, then returning later with the same cashier's check in which (b) (6), (b) (7)(C) then negotiated the check again by splitting it into different amounts for new cashier's checks. As of today's, date, one cashier's for \$186k drawn directly from the Alturas' account after an EPA drawdown has not been deposited, cashed or negotiated.

(b) (6), (b) (7)(C), (b) (5)

CASE: OI-SA-2015-CFR-0104

INTERVIEWEE (if applicable):

DATE OF ACTIVITY:
June 13, 2019

DRAFTED DATE:
June 13, 2019

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 1 of 1

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
75 HAWTHORNE STREET, 7TH FLOOR
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #:

TITLE: ALTURAS RANCHERIA TRIBE

CASE AGENT (if different from prepared by):

SIGNIFICANT INCIDENT REPORT

NARRATIVE: On August 4, 2015 Special Agent (SA) (b) (6), (b) (7)(C), U.S. EPA OIG, Office of Investigations, briefed (b) (6), (b) (7)(C), Assistant United States Attorney (AUSA), Eastern District of California, Sacramento Office, 501 I Street, Suite 10-100, Sacramento, CA, (b) (6), (b) (7)(C), on this investigation.

AUSA (b) (6), (b) (7)(C) was advised the EPA OIG had initiated an investigation regarding allegations of grant misappropriation by Alturas Rancheria Tribe (Tribe). The Tribe received an EPA grant for \$399,400 on August 8, 2013. According to EPA, the Tribe had drawn down all grant funds without proper support. It also alleged that grant funds were drawn down by (b) (6), (b) (7)(C) [REDACTED].

The investigation to date revealed \$324,400 in grant funds were drawn down by (b) (6), (b) (7)(C) [REDACTED] the grant funds were deposited into a different bank account than the previous drawdowns.

AUSA (b) (6), (b) (7)(C) advised (b) (6), (b) (7)(C), (b) (5) [REDACTED]

Attachments:

None



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

75 HAWTHORNE ST IGI-1
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #:

TITLE: (b) (6), (b) (7)(C) ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable):

PREPARED BY: (b) (6), (b) (7)(C)

**MEMORANDUM OF ACTIVITY
SIGNIFICANT INCIDENT REPORT**

NARRATIVE: On June 12, 2019, Special Agent (SA) (b) (6), (b) (7)(C), Office of Investigations, Office of Inspector General, U.S. Environmental Protection Agency, San Francisco, California, sent an Excel spreadsheet to show the flow of funds related to allegations of grant misappropriation by Alturas Rancheria Tribe (Alturas) to (b) (6), (b) (7)(C), Attorney-Advisor, Suspension and Debarment Division (S/D), Office of Grants and Debarment, U.S. EPA, Washington, D.C., (202) (b) (6), (b) (7)(C) for S/D consideration (Attachment 1). The investigation to date revealed \$324,400 in grant funds were drawn down by (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) Alturas, (b) (6), (b) (7)(C) the grant funds were deposited into the main Alturas account - co-mingled with other streams of revenue.

The review of bank records revealed a pattern of negotiating cashier's checks. (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) frequently used cashier's checks to make large debits and deposits into the Tribes account. The pattern consisted of (b) (6), (b) (7)(C) withdrawing funds into cashier's checks, then returning later with the same cashier's check in which (b) (6), (b) (7)(C) then negotiated the check again by splitting it into different amounts for new cashier's checks. As of today's, date one cashier's check for \$186,000 drawn directly from the Alturas' account after an EPA drawdown has not been deposited, cashed or negotiated.

(b) (6), (b) (7)(C) agreed to move forward.

CASE: OI-SA-2015-CFR-0104

INTERVIEWEE (if applicable):

DATE OF ACTIVITY:
June 12, 2019

DRAFTED DATE:
June 12, 2019

AGENT(S):
(b) (6), (b) (7)(C)

RESTRICTED INFORMATION
Page 1 of 2

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Attachment:

1. Financial Review of Alturas' Plumas Bank Account and EPA Drawdowns.



MOA - Financial
Analysis.docx

CASE: OI-SA-2015-CFR-0104

INTERVIEWEE (*if applicable*):

DATE OF ACTIVITY:
June 12, 2019

DRAFTED DATE:
June 12, 2019

AGENT(S):
(b)(6), (b)(7)(C)

RESTRICTED INFORMATION
Page 2 of 2

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

75 HAWTHORNE ST IGI-1
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #:

TITLE: (b) (6), (b) (7)(C) ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable):

PREPARED BY: (b) (6), (b) (7)(C)

**MEMORANDUM OF ACTIVITY
SIGNIFICANT INCIDENT REPORT**

NARRATIVE: On June 12, 2019, Special Agent (SA) (b) (6), (b) (7)(C), Office of Investigations, Office of Inspector General, U.S. Environmental Protection Agency, San Francisco, California, sent an Excel spreadsheet to show the flow of funds related to allegations of grant misappropriation by Alturas Rancheria Tribe (Alturas) to (b) (6), (b) (7)(C) Attorney-Advisor, Suspension and Debarment Division (S/D), Office of Grants and Debarment, U.S. EPA, Washington, D.C., (202) (b) (6), (b) (7)(C), for S/D consideration (Attachment 1). The investigation to date revealed \$324,400 in grant funds were drawn down by (b) (6), (b) (7)(C) Alturas, (b) (6), (b) (7)(C) and the grant funds were deposited into the main Alturas account - co-mingled with other streams of revenue.

The review of bank records revealed a pattern of negotiating cashier's checks. (b) (6), (b) (7)(C) frequently used cashier's checks to make large debits and deposits into the Tribes account. The pattern consisted of (b) (6), (b) (7)(C) withdrawing funds into cashier's checks, then returning later with the same cashier's check in which (b) (6), (b) (7)(C) then negotiated the check again by splitting it into different amounts for new cashier's checks. As of today's, date one cashier's check for \$186,000 drawn directly from the Alturas' account after an EPA drawdown has not been deposited, cashed or negotiated.

(b) (6), (b) (7)(C) agreed to move forward.

CASE: OI-SA-2015-CFR-0104

INTERVIEWEE (if applicable):

DATE OF ACTIVITY:
June 12, 2019

DRAFTED DATE:
June 12, 2019

AGENT(S):
(b) (6), (b) (7)(C)

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Attachment:

1. Financial Review of Alturas' Plumas Bank Account and EPA Drawdowns.



MOA - Financial
Analysis.docx

CASE: OI-SA-2015-CFR-0104

INTERVIEWEE (*if applicable*):

DATE OF ACTIVITY:
June 12, 2019

DRAFTED DATE:
June 12, 2019

AGENT(S):
(b)(6), (b)(7)(C)

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Page 2 of 2

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
75 HAWTHORNE STREET
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #: Case number

TITLE: ALTURAS RANCHERIA TRIBE

INTERVIEWEE (if applicable): Interviewee

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
RECORDS REVIEW

SUBJECT: Review of Plumas Bank Records and EPA Drawdowns

On May 2, 2019, Special Agent (SA) (b) (6), (b) (7)(C), EPA OIG, Office of Investigations, Operations Support Division, provided SA (b) (6), (b) (7)(C), EPA OIG, Office of Investigations, San Francisco Field Office, with an Excel spreadsheet to show the flow of funds related to allegations of grant misappropriation by Alturas Rancheria Tribe (Attachment 1). Alturas received an EPA grant for \$399,400 on August 8, 2013. The records were provided by Plumas Bank as part of an EPA OIG Inspector General Subpoena response.

The following is a summary review of debits and credits into Alturas' main bank account (b) (6), (b) (7)(C) for September 2014 and October 2014:

- (b) (6), (b) (7)(C), (b) (4), (b) (5)

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
May 2, 2019

INTERVIEWEE (if applicable):
Interviewee

DRAFTED DATE:
May 22, 2019

AGENT(S):
(b) (6), (b) (7)(C)

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Page 1 of 3

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(b) (6), (b) (7)(C), (b) (4), (b) (5)

The review of bank records revealed a pattern of negotiating cashier's checks. (b) (6), (b) (7)(C) frequently used cashier's checks to make large debits and deposits into Alturas account (b) (6), (b) (7)(C). The pattern consisted of (b) (6), (b) (7)(C) withdrawing funds into cashier's checks, then returning later with the same cashier's check in which (b) (6), (b) (7)(C) then negotiated the check again by splitting it into different amounts for new cashier's checks.

Attachment(s):

1. Excel Sheet – Alturas Account (b) (6), (b) (7)(C)



Updated Account
Schedule (b) (6), (b) (7)(C)

2. Alturas Bank Records – September & October 2014



September 2014 -
October 2014 (b) (6), (b) (7)(C).pdf

3. Correspondence with Plumas bank dated May 2, 2019.

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
May 2, 2019

INTERVIEWEE (if applicable):
Interviewee

DRAFTED DATE:
May 22, 2019

AGENT(S):
(b) (6), (b) (7)(C)

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Page 2 of 3

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Plumas Bank
Details.pdf

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
May 2, 2019

INTERVIEWEE (if applicable):
Interviewee

DRAFTED DATE:
May 22, 2019

AGENT(S):

(b) (6), (b) (7)(C)

RESTRICTED INFORMATION

Page 3 of 3

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Statement of Compliance

I, **(b) (6), (b) (7)(C)**, was served with a subpoena *duces tecum* issued by the
Inspector General of the United States Environmental Protection Agency, on
11/23/15
(Date)

In good faith, I have made a diligent search of all materials in my possession, custody, or control and have provided the materials, as listed in the attachment to this statement, in response to the subpoena. The materials provided are genuine, complete, and in full compliance with the request for materials made in the subpoena.

I state under penalty of perjury that the foregoing is true and correct.

(b) (6), (b) (7)(C)

(Name)

Admin Services officer / security officer
(Title)

1/12/16
(Date)

Quincy Ca
(City and State)

w **(b) (6), (b) (7)(C)**
(S)
(b) (6), (b) (7)(C)
(Name and Title)

1/12/16
(Date)

ADMIN COORDINATOR

Statement of Compliance

I, **(b) (6), (b) (7)(C)**, was served with a subpoena *duces tecum* issued by the Inspector General of the United States Environmental Protection Agency, on October 19th 2015.
(Date)

In good faith, I have made a diligent search of all materials in my possession, custody, or control and have provided the materials, as listed in the attachment to this statement, in response to the subpoena. The materials provided are genuine, complete, and in full compliance with the request for materials made in the subpoena.

I state under penalty of perjury that the foregoing is true and correct.

(b) (6), (b) (7)(C)

(Signature)

(b) (6), (b) (7)(C)

(Name)

Admin Services Officer
(Title)

11/10/15
(Date)

Quincy Ca 95971
(City and State)

WITNESS:

(Signature)

(Name and Title)

(Date)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
75 HAWTHORNE STREET
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #: Case number

TITLE: ALTURAS RANCHERIA TRIBE

INTERVIEWEE (if applicable): Interviewee

PREPARED BY: (b) (6), (b) (7)(C)

MEMORANDUM OF ACTIVITY
DOCUMENT REVIEW

SUBJECT: Review of Plumas Bank Business Signature Cards – Deposit Account Agreements

On April 24, 2019, Special Agent (b) (6), (b) (7)(C), OIG, Office of Investigations, conducted a document review of Plumas Bank Business Signature Cards for the Alturas Rancheria Tribe (Attachment 1). The records were provided by Plumas Bank as part of an EPA OIG Inspector General Subpoena response.

The following summarizes the Deposit Account Agreements:

Accounts (b) (6), (b) (7)(C) **and** (b) (6), (b) (7)(C)

Account Title:	(b) (6), (b) (7)(C)
Type of Ownership:	Tribal Government
Taxpayer ID/CIF#:	(b) (6), (b) (7)(C)
Signature of US Person:	(b) (6), (b) (7)(C) (printed and signed)
Signature-Agreement/Date	(b) (6), (b) (7)(C)
Signature-Terms of Agreement:	(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C) is listed as (b) (6), (b) (7)(C) and the sole proprietor for accounts (b) (6), (b) (7)(C) and # (b) (6), (b) (7)(C). (b) (6), (b) (7)(C) is the only authorized signature on file. Below are the authorized deposit agreements:

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
April 24, 2019

INTERVIEWEE (if applicable):
Interviewee

DRAFTED DATE:
April 24, 2019

AGENT(S):
(b) (6), (b) (7)(C)

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Page 1 of 2

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(b) (6), (b) (7)(C)

The account agreement is marked as "Account Closed".

Accounts # (b) (6), (b) (7)(C) and various other accounts (out of scope)

Account Title: (b) (6), (b) (7)(C)
Type of Ownership: Tribal Government
Taxpayer ID/CIF#: (b) (6), (b) (7)(C)
Signature of US Person: (b) (6), (b) (7)(C) (printed and signed) (b) (6), (b) (7)(C)
Signature-Agreement/Date: (b) (6), (b) (7)(C)
Signature-Terms of Agreement: (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C) is listed (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) is listed as (b) (6), (b) (7)(C),
(b) (6), (b) (7)(C). (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) are listed as authorized signatures on
file. Below are the authorized deposit agreements:

(b) (6), (b) (7)(C)

The account agreement is marked as "Account Closed".

Attachment(s):

1. Plumas Bank Business Signature Cards – Deposit Account Agreements



Alturas Bank
Signature Cards.pdf

CASE:
OI-SA-2015-CFR-0104

DATE OF ACTIVITY:
April 24, 2019

INTERVIEWEE (if applicable):
Interviewee

DRAFTED DATE:
April 24, 2019

AGENT(S):

(b) (6), (b) (7)(C)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

NOV 23 2015

OFFICE OF
INSPECTOR GENERAL

Plumas Bank
Attn: Risk Management
35 South Linden Avenue
Quincy, CA 95971

Dear Sir or Madam:

Pursuant to section 6(a)(4) of the Inspector General Act 1978, 5 U.S.C. app. 3, the Inspector General has issued the enclosed subpoena *duces tecum*, which is needed in support of an investigation of fraud involving federal government funds. The materials identified in Appendix A to the subpoena should be sent, via registered mail, within ten (10) days of receipt of this subpoena, to Special Agent (b) (6), an official of the Office of Inspector General, U.S. Environmental Protection Agency, 75 Hawthorne St., 7th Floor, Mail Code: IGI-1, San Francisco, CA 94105.

Fully legible and complete copies of the records called for by the subpoena will be accepted in response to the subpoena, provided the original records will be made available to officials of the Office of Inspector General, upon request, during normal business hours. Original records are required if so specified in the subpoena.

You must also complete and return the enclosed Statement of Compliance. If for any reason any of the required materials are not furnished, please list and indicate the location of such materials and the reason for non-production. It would also be helpful for you to provide us with a list identifying each document or other material furnished, and the item or items of the subpoena to which it relates.

Should you have any questions concerning the subpoena or the materials that you must produce, you may contact Associate Counsel (b) (6), (b) (7)(C) at (b) (6), (b) (7)(C).

Sincerely,

Alan Larsen

Counsel to the Inspector General

Enclosures (2)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
WASHINGTON, DC

SUBPOENA DUCES TECUM

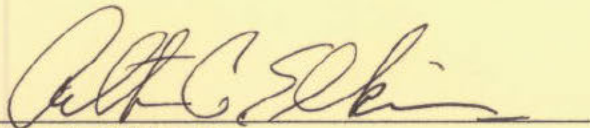
TO: Plumas Bank
Attn: Risk Management
35 South Lindan Avenue
Quincy, CA 95971

YOU ARE COMMANDED TO SEND VIA REGISTERED MAIL, on or before ten (10) days after receipt of this subpoena, the items described in Appendix A, to Special Agent (b) (6), (b) (7)(C) an official of the Office of Inspector General, U.S. Environmental Protection Agency, 75 Hawthorne St., 7th Floor, Mail Code: IG1-1, San Francisco, CA 94105.

The Inspector General needs these materials in the performance of the duties and responsibilities assigned by the Inspector General Act of 1978, as amended, 5 U.S.C. app. 3, to conduct, supervise, and coordinate audits and investigations relating to the programs and operations of the Environmental Protection Agency; to promote economy, efficiency, and effectiveness in the administration of such programs and operations; and to prevent and detect fraud and abuse in such programs and operations.

IN TESTIMONY WHEREOF, the undersigned has caused the seal of the Environmental Protection Agency to be affixed to this subpoena at Washington, D.C., this

23RD day of NOVEMBER, 2015



Arthur A. Elkins Jr.
Inspector General



APPENDIX A

DESCRIPTION OF RECORDS

All information, documents, reports, records, papers, and other documentary materials, including electronically stored data, in the possession, custody or control of Plumas Bank from November 5, 2013 to August 15, 2015, relative to any and all accounts associated with the Alturas Rancheria Tribe and/or Alturas Rancheria Tribal Council, including, but not limited to:

1. Signature cards.
2. Monthly checking account statements.
3. Cancelled checks, front and back.
4. Transcripts of all savings accounts deposits and withdrawals.
5. Deposit slips and deposit items on all checking and/or savings accounts.
6. Withdrawal slips on all checking and/or savings accounts.
7. Debit and credit memos.
8. Bank drafts, manager's checks, cashier's checks, travelers checks, treasurer's checks and/or money orders.
9. Electronic/automated teller transaction records.
10. Wire transfer, FedWire or other money transfer records.
11. Automated Clearinghouse records and documentation.
12. Personal and business loan applications, notes, agreements, correspondence, and loan records including collateral and mortgage agreements.
13. Safe deposit box records of access, signature card and payment records.
14. Financial statements.
15. Promissory notes.
16. Certificates of deposit, stocks, securities, and bonds.
17. Forms 1098, 1099 or other withholding documents.
18. Investment and/or collateral accounts.
19. Credit accounts, credit reports, and supporting documents.
20. Trust or custodian accounts, signature cards, and agreements.

Statement of Compliance

I, _____, was served with a subpoena *duces tecum* issued by the
Inspector General of the United States Environmental Protection Agency, on

(Date)

In good faith, I have made a diligent search of all materials in my possession, custody, or control and have provided the materials, as listed in the attachment to this statement, in response to the subpoena. The materials provided are genuine, complete, and in full compliance with the request for materials made in the subpoena.

I state under penalty of perjury that the foregoing is true and correct.

(Signature)

(Name)

(Title)

(Date)

(City and State)

WITNESS:

(Signature)

(Name and Title)

(Date)

REQUEST FOR STANDARD SUBPOENA

November 18, 2015

MEMORANDUM FOR: Arthur A. Elkins, Jr.
Inspector General

FROM: (b) (6)
Special Agent in Charge
Office of Investigations

I request that you issue a subpoena in the matter described below:

1. Authority: **IG Act of 1978, as amended, 5 U.S.C. app. 3**
2. OIG File Number: **OI-SA-2015-CFR-0104**
3. Nature of the inquiry: **Investigation**
4. EPA Program: **Indian Environmental General Assistance Program**
5. Subject of inquiry: **Alturas Rancheria Tribe, (b) (6), (b) (7)(C)**
(b) (6), (b) (7)(C)
6. Name and/or title of the person/entity to be subpoenaed:

**Plumas Bank
Attn: Risk Management
35 South Linden Avenue
Quincy, CA 95971**

7. (b) (6), (b) (7)(C), (b) (5)

8.

9.

10

11. (b) (6), (b) (7)(C), (b) (5)

12.

13.

14.

15.

16.

ATTACHMENT A

A. PURPOSE OF THE SUBPOENA:

To obtain bank records of the Alturas Rancheria Tribe to determine if EPA grant funds were misappropriated.

On October 19, 2015 the OIG served a subpoena for records to Plumas Bank. The subpoena requested all documents "relative to any and all accounts in the name of (1) Alturas Rancheria Tribe; (2) Alturas Rancheria Tribal Council." (b) (5)

(b) (5)

B. SUMMARY OF KNOWN FACTS:

The Alturas Rancheria Tribe (ART) received \$399,400 under EPA grant #GA00T128010 to fund General Assistance Program activities from 2013 to 2014. (b) (6), (b) (7)(C), (b) (5)

(b) (6), (b) (7)(C), (b) (5)

When the grant was awarded on August 7, 2013, (b) (6), (b) (7)(C) was the Tribal Chairman, (b) (6), (b) (7)(C) was the Tribal Vice-Chairman, and (b) (6), (b) (7)(C) was the Tribal Secretary-Treasurer. At this time, (b) (6), (b) (7)(C) was employed as the Tribal Administrator and authorized to drawdown grant funds. (b) (6), (b) (7)(C) was employed as the Tribe's Environmental Director and was responsible for managing the EPA grant. According to EPA personnel, the grant ran smoothly in 2013 until the middle of 2014. During this time, (b) (6), (b) (7)(C) drew down \$25,000 and \$50,000 on November 5, 2013 and January 10, 2014, respectively. According to EPA records, both drawdowns were deposited into Plumas Bank account (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C), (b) (5)

(b) (6), (b) (7)(C), (b) (5)

C. VIOLATIONS:

18 U.S.C. § 666 Theft or Bribery Concerning Programs Receiving Federal Funds
18 U.S.C. § 1343 Wire Fraud
18 U.S.C. § 1163 Embezzlement and Theft from Indian Tribal Organizations

D. JURISDICTION:

This investigation is within EPA's jurisdiction because the allegations claim embezzlement of EPA grant funds.

ATTACHMENT B DESCRIPTION OF RECORDS

All information, documents, reports, records, papers, and other documentary materials, including electronically stored data, in the possession, custody or control of Plumas Bank from November 5, 2013 to August 15, 2015, relative to any and all accounts associated with the Alturas Rancheria Tribe and/or Alturas Rancheria Tribal Council, including, but not limited to:

1. Signature cards.
2. Monthly checking account statements.
3. Cancelled checks, front and back.
4. Transcripts of all savings accounts deposits and withdrawals.
5. Deposit slips and deposit items on all checking and/or savings accounts.
6. Withdrawal slips on all checking and/or savings accounts.
7. Debit and credit memos.
8. Bank drafts, manager's checks, cashier's checks, travelers checks, treasurer's checks and/or money orders.
9. Electronic/automated teller transaction records.
10. Wire transfer, FedWire or other money transfer records.
11. Automated Clearinghouse records and documentation.
12. Personal and business loan applications, notes, agreements, correspondence, and loan records including collateral and mortgage agreements.
13. Safe deposit box records of access, signature card and payment records.
14. Financial statements.
15. Promissory notes.
16. Certificates of deposit, stocks, securities, and bonds.
17. Forms 1098, 1099 or other withholding documents.
18. Investment and/or collateral accounts.
19. Credit accounts, credit reports, and supporting documents.
20. Trust or custodian accounts, signature cards, and agreements.

RETURN OF SERVICE

I hereby certify that I served a copy of this subpoena on the person named herein by --

1. delivering it in person to:

Name _____

Title _____

Address _____

2. leaving it at the principal office or place of business, namely:

Description of premises _____

Address _____

3. mailing it by certified mail, return receipt requested, and first class mail to:

Name Plumas Bank

Title Risk Department

Address 35 S. Linden Ave

Quincy, CA 95971

Signature (b) (6), (b) (7)(C)

Name of server (b) (6), (b) (7)(C)

Title Special Agent

Date 11/24/15

ACKNOWLEDGMENT OF SUBPOENA RECEIPT

I hereby acknowledge that a copy of this subpoena was served upon me.

Signature _____

Name _____

Title _____

Date _____

UNITED STATES OF AMERICA ENVIRONMENTAL PROTECTION AGENCY OFFICE OF INSPECTOR GENERAL

SUBPOENA DUCES TECUM





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
INSPECTOR GENERAL

Plumas Bank
Attn: Risk Management
35 South Lindan Avenue
Quincy, CA 95971

OCT 19 2015

Dear Sir or Madam:

Pursuant to section 6(a)(4) of the Inspector General Act 1978, 5 U.S.C. app. 3, the Inspector General has issued the enclosed subpoena *duces tecum*, which is needed in support of an investigation of fraud involving federal government funds. The materials identified in Appendix A to the subpoena should be sent, via registered mail, on or before October 30, 2015, to Special Agent (b) (6) an official of the Office of Inspector General, U.S. Environmental Protection Agency, 75 Hawthorne St., 7th Floor, Mail Code: IGI-1, San Francisco, CA 94105.

Fully legible and complete copies of the records called for by the subpoena will be accepted in response to the subpoena, provided the original records will be made available to officials of the Office of Inspector General, upon request, during normal business hours. Original records are required if so specified in the subpoena.

You must also complete and return the enclosed Statement of Compliance. If for any reason any of the required materials are not furnished, please list and indicate the location of such materials and the reason for non-production. It would also be helpful for you to provide us with a list identifying each document or other material furnished, and the item or items of the subpoena to which it relates.

Should you have any questions concerning the subpoena or the materials that you must produce, you may contact Associate Counsel (b) (6), (b) (7)(C) at (b) (6)

Sincerely,

A handwritten signature in blue ink, appearing to read "Alan Larsen".

Alan Larsen
Counsel to the Inspector General

Enclosures (2)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
WASHINGTON, DC

SUBPOENA DUCES TECUM

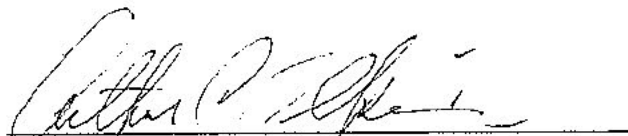
TO: Plumas Bank
Attn: Risk Management
35 South Linden Avenue
Quincy, CA 95971

YOU ARE COMMANDED TO SEND VIA REGISTERED MAIL, on or before, October 30, 2015, the items described in Appendix A, to Special Agent (b) (6) an official of the Office of Inspector General, U.S. Environmental Protection Agency, 75 Hawthorne St., 7th Floor, Mail Code: IG1-1, San Francisco, CA 94105.

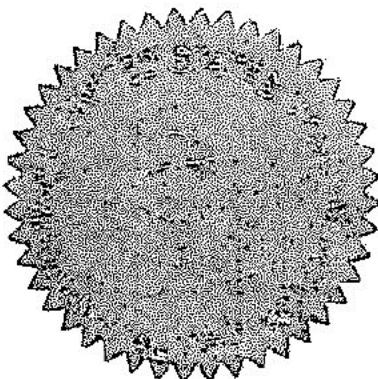
The Inspector General needs these materials in the performance of the duties and responsibilities assigned by the Inspector General Act of 1978, as amended, 5 U.S.C. app. 3, to conduct, supervise, and coordinate audits and investigations relating to the programs and operations of the Environmental Protection Agency; to promote economy, efficiency, and effectiveness in the administration of such programs and operations; and to prevent and detect fraud and abuse in such programs and operations.

IN TESTIMONY WHEREOF, the undersigned has caused the seal of the Environmental Protection Agency to be affixed to this subpoena at Washington, D.C., this

19TH day of OCTOBER, 2015



Arthur A. Elkins Jr.
Inspector General



APPENDIX A DESCRIPTION OF RECORDS

All information, documents, reports, records, papers, and other documentary materials, including electronically stored data, in the possession, custody or control of Plumas Bank from November 5, 2013 through August 15, 2015, relative to any and all accounts in the name of (1) Alturas Rancheria Tribe; (2) Alturas Rancheria Tribal Council; (3) Account Number (b) (6) and (4) Account Number (b) (6), including, but not limited to:

1. Signature cards.
2. Monthly checking account statements.
3. Cancelled checks, front and back.
4. Transcripts of all savings accounts deposits and withdrawals.
5. Deposit slips and deposit items on all checking and/or savings accounts.
6. Withdrawal slips on all checking and/or savings accounts.
7. Debit and credit memos.
8. Bank drafts, manager's checks, cashier's checks, travelers checks, treasurer's checks and/or money orders.
9. Electronic/automated teller transaction records.
10. Wire transfer, FedWire or other money transfer records.
11. Automated Clearinghouse records and documentation.
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13. Safe deposit box records of access, signature card and payment records.
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15. Promissory notes.
16. Certificates of deposit, stocks, securities, and bonds.
17. Forms 1098, 1099 or other withholding documents.
18. Investment and/or collateral accounts.
19. Credit accounts, credit reports, and supporting documents.
20. Trust or custodian accounts, signature cards, and agreements.

Statement of Compliance

I, _____, was served with a subpoena *duces tecum* issued by
the Inspector General of the United States Environmental Protection Agency, on
_____.
(Date)

In good faith, I have made a diligent search of all materials in my possession, custody, or control
and have provided the materials, as listed in the attachment to this statement, in response to the
subpoena. The materials provided are genuine, complete, and in full compliance with the request
for materials made in the subpoena.

I state under penalty of perjury that the foregoing is true and correct.

(Signature)

(Name)

(Title)

(Date)

(City and State)

WITNESS:

(Signature)

(Name and Title)

(Date)

RETURN OF SERVICE

I hereby certify that I served a copy of this subpoena on the person named herein by -

1. delivering it in person to:

Name _____

Title _____

Address _____

2. leaving it at the principal office or place of business, namely:

Description of premises _____

Address _____

3. mailing it by certified mail, return receipt requested, and first class mail to:

Name Plumas Bank

Title Risk Department

Address 35 S. Linden Ave

Quincy, CA 95971

Signature (b) (6)

Name of server (b) (6)

Title Special Agent

Date 10/23/15

ACKNOWLEDGMENT OF
SUBPOENA RECEIPT

I hereby acknowledge that a copy of this subpoena was served upon me.

Signature _____

Name _____

Title _____

Date _____

UNITED STATES OF AMERICA
ENVIRONMENTAL PROTECTION
AGENCY
OFFICE OF INSPECTOR GENERAL

SUBPOENA DUCES TECUM



From: [UPS Quantum View](#)
To: (b) (6)
Subject: UPS Delivery Notification, Tracking Number (b) (6)
Date: Thursday, October 22, 2015 10:19:17 AM

UPS



***Do not reply to this e-mail. UPS and EPA IMMEDIATE OFFICE OI will not receive your reply.

At the request of EPA IMMEDIATE OFFICE OI, this notice is to confirm that the following shipment has been delivered.

Important Delivery Information

Tracking Number: (b) (6)
Delivery Date / Time: 22-October-2015 / 10:08 AM

Delivery Location: INSIDE DELIVERY
Signed by: (b) (6)

Shipment Detail

Ship To:
Plumas Bank
35 S LINDAN AVE
QUINCY
CA
95971
US

Number of Packages: 1
UPS Service: NEXT DAY AIR
Weight: 0.2 LBS

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For questions or comments, visit Contact UPS.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY OFFICE OF INSPECTOR GENERAL

CASE #: OI-SA-2015-CFR-0104

TITLE: ALTURAS RANCHERIA TRIBE

PREPARED BY: (b) (6), (b) (7)(C)

DISPOSITION REPORT OF INVESTIGATION

Date: 8/4/2015

Disposition: Pending Investigation

Comments:

N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
75 HAWTHORNE STREET, 7TH FLOOR
SAN FRANCISCO, CA 94105

August 14, 2015

(b) (6), (b) (7)(C)

Special Agent in Charge
Federal Bureau of Investigations

(b) (6), (b) (7)(C)

Dear SAIC (b) (6), (b) (7)(C)

Pursuant to the Homeland Security Act of 2002, we are notifying your Agency of a new case which may be of mutual interest:

DATE OPENED: August 11, 2015
SUBJECT NAME: Alturas Rancheria Tribe
ADDRESS: P.O. Box 967
Janesville, CA 96114
CASE NUMBER: OI-SA-2015-CFR-0104
EPA CASE AGENT: (b) (6), (b) (7)(C)

ISSUE/ALLEGATION: My office has initiated a case regarding allegations of fraudulent activities by the Alturas Rancheria Tribe (ART). ART received a U.S. Environmental Protection Agency (EPA) grant for \$399,400 on August 7, 2013. According to EPA management, ART drew down \$324,400 in a lump sum without any support or justification. The funding was drawn down by an individual who had recently been terminated by the Tribe and was deposited into an account other than the Tribe's general account.

If you have any questions or wish to discuss this case in further detail, please contact the case agent, (b) (6), (b) (7)(C) at (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

Acting Special Agent in Charge



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
75 HAWTHORNE STREET, 7TH FLOOR
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #:

TITLE: ALTURAS RANCHERIA TRIBE

CASE AGENT (if different from prepared by):

MEMORANDUM OF ACTIVITY





SUBJECT: Timeline of Events

On August 5, 2015, Special Agent (b) (6), (b) (7)(C), EPA, OIG, Office of Investigations, created a timeline of events regarding the allegations of grant misappropriation associated with EPA grant #GA00T128010 awarded to the Alturas Rancheria Tribe. The documents used in the timeline were provided by (b) (6), (b) (7)(C), Region 9, EPA, (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C), Las Vegas Finance Center, EPA, (b) (6), (b) (7)(C).





Alturas Rancheria
Timeline.docx

Alturas Rancheria – EPA Grant #GA00T12801

DATE	SUMMMARY	DOCUMENT
04/20/2013	Alturas Rancheria submitted an application to EPA requesting a grant under EPA's Tribal General Assistance Program (GAP). GAP grants are awarded to tribes to develop tribal environmental programs. The grant application was signed by (b) (6), (b) (7)(C) . The application identified (b) (6), (b) (7)(C) who would be responsible for the grant activities and (b) (6), (b) (7)(C) , who would be responsible for receiving the grant payments.	 Alturas Rancheria Application.pdf
08/07/2013	EPA awarded Alturas Rancheria \$75,000 to fund GAP related activities from 10/1/2013 – 9/30/2014. The grant award states “The objective of this project is to develop the Alturas Rancheria's environmental protection capacity. This will involve hiring and training environmental staff, developing an environmental inventory and plan, assessing administrative capacity, coordinating and consulting with various entities, and providing outreach and education to members.”	 Alturas Rancheria GA-00T18201-0 - Aw
11/06/2013	(b) (6), (b) (7)(C) withdrew and deposited \$25,000 in EPA grant funds into Plumas Bank account # (b) (6), (b) (7)(C) .	 Alturas Drawdowns.pdf
01/14/2014	(b) (6), (b) (7)(C) withdrew and deposited \$50,000 in EPA grant funds into Plumas Bank account # (b) (6), (b) (7)(C) .	See Alturas Drawdowns
08/08/2014	EPA awarded Alturas Rancheria an additional \$324,400 to fund GAP related activities from 10/1/2014 – 9/30/2015. (b) (5)	 Alturas Rancheria GA-00T18201-1 - Aw

09/10/2014	<p>(b) (6), (b) (7)(C) were terminated via termination memos signed by (b) (6), (b) (7)(C).</p> <p>[Note: EPA was not notified that (b) (6), (b) (7)(C) had been terminated]</p>	 Termination (b) (6), (b) (7)(C).pdf  Te ation (b) (6), (b) (7)(C).pdf
09/16/2014	(b) (6), (b) (7)(C) withdrew and deposited \$124,400 in EPA grant funds into Plumas Bank account (b) (6), (b) (7)(C), which is a different bank account from the prior two deposits.	See Alturas Drawdowns
10/15/2014	(b) (6), (b) (7)(C) withdrew and deposited \$200,000 in EPA grant funds into Plumas Bank account # (b) (6), (b) (7)(C).	See Alturas Drawdowns
01/22/2015	<p>EPA representative contacted (b) (6), (b) (7)(C) about the large withdrawals. (b) (6), (b) (7)(C) stated (b) (6), (b) (7)(C) last day with the tribe was in September 2014, when the council dispute began. To avoid one side of the Council from having access to the EPA funds, they were drawn down and placed in a safe bank account. (b) (6), (b) (7)(C)</p>	 1 22 15 (b) (6), (b) (7)(C) corr.pdf
05/07/2015	EPA issued a Grant Enforcement Warning to Alturas Rancheria, addressed to (b) (6), (b) (7)(C), stating the \$324,400 in drawdowns does not appear to be based on actual expenditures as required by federal regulations. EPA requests Alturas Rancheria to provide supporting documentation for the drawdowns or return the funding.	 5.7.15 Enforcement Warning.pdf
05/22/2015	<p>(b) (6), (b) (7)(C) sends a letter to EPA stating the grant funds were moved to a safe account to protect them “from being misused by a rouge Tribal faction that was in the process of attempting a Tribal government overthrow.” (b) (6), (b) (7)(C) provided a basic excel spreadsheet accounting for \$84,325 of the \$324,400 in funds and stated (b) (6), (b) (7)(C) could not provide bank statements because the bank accounts were frozen pending resolution of the of the leadership dispute.</p>	 5.22.15 (b) (6), (b) (7)(C)

06/30/2015	<p>EPA received an email from (b) (6), (b) (7)(C) Alturas Rancheria. (b) (6), (b) (7)(C) Tribe's Business Council to contact EPA regarding the questioned grant drawdowns. (b) (6), (b) (7)(C) grant funds were drawdown by (b) (6), (b) (7)(C), were not authorized by the Tribe's governing body, and have not been deposited into any lawful tribal bank account. (b) (6), (b) (7)(C)</p> <p>EPA responded to (b) (6), (b) (7)(C) stating that per the 04/03/15 BIA letter, it can only communicate with (b) (6), (b) (7)(C) regarding the EPA grant.</p>	 (b) (6), (b) (7)(C) email.p
07/30/2015	<p>EPA received an email from (b) (6), (b) (7)(C) requesting all grant related documentation and correspondence with (b) (6), (b) (7)(C), (b) (5)</p> <p>(b) (6), (b) (7)(C)</p> <p>(b) (6), (b) (7)(C), (b) (5), (b) (7)(E)</p>	 7 (b) (6), (b) (7)(C) mail.pdf



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
75 HAWTHORNE STREET, 7TH FLOOR
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #:

TITLE: ALTURAS RANCHERIA TRIBE

CASE AGENT (if different from prepared by):

MEMORANDUM OF ACTIVITY

SUBJECT: Review of Drawdown Records Associated with Grant #GA00T128010

On August 3, 2015, Special Agent (SA) (b) (6), (b) (7)(C), EPA, OIG, Office of Investigations, conducted a review of the drawdown records associated with EPA grant #GA00T128010 awarded to the Alturas Rancheria Tribe. The drawdown records were provided by (b) (6), (b) (7)(C), Las Vegas Finance Center, EPA, (b) (6), (b) (7)(C).

The following summarizes who drew down the grant funds and what bank account they were deposited into.

Date Requested	Requester	Amount	Bank Account
11/05/2013	(b) (6), (b) (7)(C)	\$25,000	Plumas Bank - (b) (6), (b) (7)(C)
01/10/2014	(b) (6), (b) (7)(C)	\$50,000	Plumas Bank - (b) (6), (b) (7)(C)
09/15/2014	(b) (6), (b) (7)(C)	\$124,400	Plumas Bank - (b) (6), (b) (7)(C)
10/14/2014	(b) (6), (b) (7)(C)	\$200,000	Plumas Bank - (b) (6), (b) (7)(C)

Attachments:

1. Drawdown records for grant # GA00T128010.



Alturas Drawdown
Records.pdf



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

75 HAWTHORNE ST IGI-1
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #:

TITLE: (b) (6), (b) (7)(C) ALTURAS, CALIFORNIA

INTERVIEWEE (if applicable):

PREPARED BY: (b) (6)

**MEMORANDUM OF ACTIVITY
SIGNIFICANT INCIDENT REPORT**

NARRATIVE: On June 13, 2019, Special Agent (SA) (b) (6), (b) (7)(C), U.S. EPA OIG, Office of Investigations (EPA OIG-OI), briefed (b) (6), (b) (7)(C), Assistant United States Attorney (AUSA), Eastern District of California, Sacramento Office, 501 I Street, Suite 10-100, Sacramento, California, (b) (6), (b) (7)(C), on this investigation. AUSA (b) (6) was advised the EPA OIG-OI had initiated an investigation regarding allegations of grant misappropriation by Alturas Rancheria Tribe (Alturas). Alturas received an EPA grant for \$399,400 on August 8, 2013.

The investigation to date revealed \$324,400 in grant funds were drawn down in 2014 by (b) (6), (b) (7)(C)

The grant funds were deposited into the main Alturas account - co-mingled with other streams of revenue. A review of bank records revealed a pattern of negotiating cashier's checks (b) (6), (b) (7)(C) Alturas, frequently used cashier's checks to make large debits and deposits into the Tribes account. The pattern consisted of (b) (6), (b) (7)(C) withdrawing funds into cashier's checks, then returning later with the same cashier's check in which (b) (6), (b) (7)(C) then negotiated the check again by splitting it into different amounts for new cashier's checks. As of today's, date, one cashier's for \$186k drawn directly from the Alturas' account after an EPA drawdown has not been deposited, cashed or negotiated.

AUSA (b) (6), (b) (7)(C) advised (b) (6), (b) (7)(C), (b) (5)

CASE: OI-SA-2015-CFR-0104

INTERVIEWEE (if applicable):

DATE OF ACTIVITY:
June 13, 2019

DRAFTED DATE:
June 13, 2019

AGENT(S):
(b) (6)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
75 HAWTHORNE STREET, 7TH FLOOR
SAN FRANCISCO, CA 94105

CASE #: OI-SA-2015-CFR-0104

CROSS REFERENCE #: HOTLINE 2015-275

TITLE: ALTURAS RANCHERIA TRIBE

CASE AGENT (if different from prepared by):

CASE INITIATION

Subject(s)	Location	Other Data
Alturas Rancheria Tribe	P.O. Box 967 Janesville, CA 96114	None

NARRATIVE: On June 26, 2015, the Environmental Protection Agency (EPA), Office of Inspector General (OIG), Hotline received a complaint (b) (6), (b) (7)(C), (b) (3) [REDACTED] alleged that the Alturas Rancheria Tribe (Tribe), P.O. Box 967, Janesville, CA 96114, overdraw Grant #GA00T128010 and did not have any documentation to support its expenditure of EPA funds. It is also alleged that grant funds were drawn down by individuals who were previously terminated by the tribe.

On August 3, 2015, Special Agent (SA) (b) (6), (b) (7)(C) [REDACTED] reviewed documentation provided by the Tribe which confirmed (b) (6), (b) (7)(C) [REDACTED], and (b) (6), (b) (7)(C) [REDACTED], were terminated by the Tribe (b) (6), (b) (7)(C) [REDACTED].

On August 3, 2015 SA (b) (6), (b) (7)(C) [REDACTED] obtained the drawdown records associated with grant #GA00T128010, from (b) (6), (b) (7)(C) [REDACTED], Las Vegas Finance Center, EPA, (b) (6), (b) (7)(C) [REDACTED]. The drawdown records show that (b) (6), (b) (7)(C) [REDACTED] drew down \$124,400 and \$200,000 on September 16, 2014 and October 15, 2014, respectively. The last two withdrawals totaling \$324,400 were deposited into a different bank account than the previous drawdowns.

This case is within the jurisdiction of the EPA Office of Inspector General as it pertains to the potential theft of grants funds awarded by the EPA to the Tribe.

Potential violations include:

18 U.S.C. § 666 (Theft or Bribery Concerning Programs Receiving Federal Funds)

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL**

75 HAWTHORNE STREET, 7TH FLOOR
SAN FRANCISCO, CA 94105

CASE #: COMP-2015-144

CROSS REFERENCE #: HOTLINE 2015-275

TITLE: ALTURAS RANCHERIA TRIBE

CASE AGENT (if different from prepared by):

COMPLAINT INITIATION

Subject(s)	Location	Other Data
Alturas Rancheria Tribe	P.O. Box 967 Janesville, CA 96114	None

NARRATIVE: On June 26, 2015, the Environmental Protection Agency (EPA), Office of Inspector General (OIG), Hotline received a complain (b) (6), (b) (7)(C), (b) (3) [REDACTED] alleged that the Alturas Rancheria Tribe, P.O. Box 967, Janesville, CA 96114, overdrew Grant #GA00T128010 and did not have any documentation to support its expenditure of EPA funds. It is also alleged that grant funds were drawn down by individuals who were previously terminated by the tribe.

Attachment:

1. Hotline Complaint 2015-275



2015-275
referral.pdf